OPERATION OF THE DEPARTMENT OF DEFENSE EDUCATION SYSTEM

HEARING

BEFORE THE

SUBCOMMITTEE ON
MANPOWER AND PERSONNEL

OF THE

COMMITTEE ON ARMED SERVICES
UNITED STATES SENATE

NINETY-SEVENTH CONGRESS

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OPERATION OF THE DEPARTMENT OF DEFENSE EDUCATION SYSTEM

THURSDAY, DECEMBER 9, 1982

U.S. Senate,
Committee on Armed Services,
Subcommittee on Manpower and Personnel,
Washington, D.C.

The subcommittee met, in open session, pursuant to notice, at 9:30 a.m., in room 224, Russell Senate Office Building, Senator Roger W. Jepsen, chairman, presiding.

Members present: Senators Jepsen and Quayle.

Staff present: Anthony J. Principi, counsel; Mary A. Shields, research assistant; and Kimberly A. Manning, staff assistant.

Also present: Jon Etherton, assistant to Senator Jepsen, and Jim Wolf and Hank Steenstra, assistants to Senator Quayle.

OPENING STATEMENT BY SENATOR ROGER W. JEPSEN, CHAIRMAN

Senator Jepsen. The Subcommittee on Manpower and Personnel convenes this morning to consider testimony on whether to continue the operation of the Defense Department's education system in the Department of Defense.

Public Law 96-88, the Department of Education Organization Act, required the transfer of the Department of Defense Dependents' School System to the Department of Education by May 3, 1983.

As a result of concerns expressed by many of my colleagues over the proposed transfer, the Department of Defense Authorization Act, 1983 extended the scheduled transfer date for 1 year until May 1984. This extension will afford the committee the opportunity to carefully review this proposed transfer to insure that it would provide for a sound and efficient educational system for overseas dependents of military and civilian personnel.

There is a long history of defense involvement in military dependent education. The need for schools to educate dependents of military personnel was first recognized during the War of 1812.

In 1821, Congress approved of this innovative educational program and appropriated funds to support it. For the next century the Army operated its own dependents school system.

Since the end of World War II, the overseas school system expanded greatly. In order to establish a standardized school system, steps were initiated in 1965 to place policy control for the program in the office of the Assistant Secretary of Defense for Manpower and Reserve Affairs.

In 1976, as a result of congressional directive, the Secretary of Defense created the Department of Defense Dependents' School System as a single entity. Today, this system educates approximately 136,000 students in 270 different schools located in 20 foreign countries.

We must be mindful that there are many factors which distinguish DODDS from other educational systems in this country. Defense strategic planning and movement logistics, distant location, and dealing with foreign governments are just a few of the many issues which should be assessed carefully before transitioning to a new system.

This morning we are fortunate to have with us witnesses who can speak to these issues. I am pleased to welcome Hon. Gary Jones, Under Secretary of Education; Hon. Lawrence J. Korb, Assistant Secretary of Defense for Manpower, Reserve Affairs and Logistics; Dr. Beth Stephens, Director of the DODDS; Jack Rollins, president, Overseas Education Association; and a panel consisting of: Henry Foley, counselor, Torrejon High School; Nancy Lee Hill, educator, Seoul American High School; Myra Cook, advisory committee member, Frankfurt High School; and Dr. Heidemarie Shurtleff, representative, Overseas Federation of Teachers.

I would advise the panel that I regret that I will have to leave for a bit at or about 10 minutes to 10, but my good colleague from Indiana, Senator Quayle, will chair this hearing.

At this time I recognize the sponsor of S. 1474, my distinguished colleague from Indiana, Senator Quayle, for any statement he may wish to make.

STATEMENT BY SENATOR DAN QUAYLE

Senator QUAYLE. Thank you very much, Mr. Chairman. I certainly appreciate your having these hearings.

I think it is very important that we get before the subcommittee and before the Congress the issue of the DOD schools, whether they should or should not be transferred to the Department of Education.

As you know, when we went into conference the Senate acted last year to retain the DOD schools in the Department of Defense. In the compromise we got a 1-year extension so that Congress is going to have to deal with this issue and make a determination.

The Senate appears to favor keeping the schools in DOD. The House has not really voted on the issue. I hope they will have some hearings over there in the House Armed Services as well.

I certainly want to thank you and express my appreciation for your work on this very important issue. There is only one issue as far as I am concerned and that is the children, the quality of education they are going to get.

We keep talking about Government organization and everything. It is about time we focus on the kids. I think we have to ask ourselves which is the best way to have the potential of increase in the quality of education for the children? That is the bottom line as far as I am concerned, not whose jurisdiction it is going to be in, but the most efficient way to improve the quality of education for our children.

Is it to transfer the schools over to the Department of Education and put it in there? Is there some good reason why it has not worked under the Department of Defense? We have to examine the success of the way the Department of Defense has handled it.

If there is some reason they are unable to handle it, then let us change it. I certainly believe the burden is on those who want to make the move and let them show the reason why they have to make that move. If it is working and it is proven that the quality of education and test scores and things like that are lower and we ought to make that transfer, let the facts come out.

If we find out the children are doing very well, even, on a comparative basis, doing better here than some of the students who are getting an education in the States, then I think it certainly would be a good reason not to change.

These are things we don't really know. We are certainly going to find out. Those are the things I am interested in. I am interested in quality education for the children. Let us hope we don't get into any kind of bureaucratic fight. Let us hope we don't get into a labor union fight, that certain labor unions have to have a lot of people under their control.

Let us look at the kids for a change. That is certainly the direction I am going to be going in the questioning.

I certainly appreciate your interest in this, Mr. Chairman. I ask that my entire statement be put in the record.

I also ask that the statement from the CRS on the Department of Defense Dependents' School be inserted in the record, too.

Senator JEPSEN. Without objection, they will be inserted.

[The prepared statement of Senator Dan Quayle and the research report "Department of Defense Dependent Schools," follows:]

PREPARED STATEMENT OF SENATOR DAN QUAYLE

I would like to thank you, Mr. Chairman, for holding these important hearings during what has become a very busy lame-duck session. Despite the busy calendar, we have before us the important issue of the status of the Defense Dependents Schools, an issue upon which the Senate has decidedly spoken several times, and one which must be addressed by the full Congress. I would like to thank the witnesses who have assembled here today to help us explore this issue and to help the Senate carry out its responsibility for oversight of the overseas dependent schools.

Mr. Chairman, the real issue before us here is whether the Department of Defense Schools, which are now functioning smoothly in the Department of Defense, should remain as a part of our commitment to a strong national defense, a volunteer army, and an efficient military organization.

The principal purpose of my bill, S. 1474, which is before us today is to rescind those provisions of the Department of Education Organization Act which require the transfer of the Department of Defense schools to the Education Department by no later than May 3, 1984. An additional purpose of the amendment is to return the Advisory Council on Dependents' Education to the Department of Defense by amending the Defense Dependents' Education Act of 1978.

The overseas dependents schools, currently operated by the Department of Defense, are located in military installations in twenty foreign countries and enroll approximately 136,000 children from kindergarten through high school. These schools are modeled after public schools in the United States and provide a sound education to dependents of Department of Defense personnel, allowing them to re-enter American schools with relative ease after a lengthy overseas tour.

The Department of Defense schools are accredited by the North Central Association of Colleges and Schools, an American commission on schools, and overseas students consistently achieve Scholastic Aptitude Test scores which compare favorably to scores achieved in American public schools.

Mr. Chairman, I think it is clear that a transfer of the defense schools to another Federal agency is not likely to improve upon these successes. The overseas dependents schools should continue to be operated by the Defense Department. My bill contemplates that the Secretary of Defense may call upon the Secretary of Education for information, advice, and technical assistance in continuing to provide an education of high quality to military dependents. Numerous economic, administrative, and military considerations are present, however, which strongly argue against a transfer of the schools to the Education Department.

First, the transfer is likely to create problems from a fiscal standpoint. For example, the Department of Defense schools are currently supported by finance and payroll offices operated by the Army, Navy, and Air Force as an addition to the existing military mission. These fiscal offices will not be transferred, and it will be necessary for the gaining agency to establish a separate financial management system to service the overseas schools. This new system would be costly and inefficient, requiring hundreds of additional employees to assume new tasks now being handled by the military services.

Furthermore, the Education Department would have to assume many hidden costs which are difficult to ascertain because they arise out of essential services now provided by local military commanders on a non-reimbursing basis. These services include communications, mail delivery, shipment of supplies, contracting assistance, and physical security. The Education Department would have to assume many of these responsibilities or provide budget support for them if the schools are placed under the exclusive jurisdiction of that agency.

Second, experience has shown that a division of authority between two Departments clearly erodes efficiency in overall management. Yet this would be a result of the defense schools being transferred to the Department of Education. For example, the Department of Education Organization Act (Public Law No. 96–88) currently provides in sections 401 and 419 that school personnel will continue to be treated as Department of Defense employees for certain purposes following the transfer. These provisions will lead to confusion in many instances with respect to administrative authority governing the employees' activities.

Finally, the fiscal and administrative issues discussed above are matched by the important considerations of military effectiveness. The defense schools are an integral and coordinated part of the total defense support structure, and school policies now incorporate many unique military considerations arising out of mission, operational and morale requirements.

The intangible but sensitive working relationship between educators, school policymakers, and military commanders would be lost upon a transfer of the schools to another Federal agency and could not be replaced by a series of interagency agreements or memoranda. Such a loss would hamper the military's efficiency in responding to defense commitments which may involve the transfer and education of dependents.

For these reasons, Mr. Chairman, my legislation would rescind the projected transfer of the defense schools to the Education Department. The specific amendments encompass two major provisions. The initial section of the bill amends the Department of Education Organization Act by Repealing all sections and provisions of that Act relating to the overseas dependents' schools system, its transfer and its planned administration by the Education Department. The second section amends the Defense Dependents Education Act by returning the Advisory Council on Dependents' Education to the Department of Defense. The bill additionally provides authority for the Secretary of Defense to call upon the Secretary of Education for advice and technical support in the operation of the schools.

We have before us a distinguished group of witnesses, some of whom have traveled half-way around the world to be here. We are particularly lucky to have before us people who actually work with the schools—teachers, counselors, and parents—and so I would like to get right to their testimony.

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DEPARTMENT OF DEFENSE DEPENDENTS SCHOOLS

Prepared in Response to the
Request of the House Committee
on Education and Labor

K. Forbis Jordan
Senior Specialist in Education
Office of Senior Specialists
October 22, 1981

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SUMMARY

The Department of Defense Dependents Schools (DODDS) operates 270 schools for dependents of Department of Defense (DOD) employees in 20 nations and enrolls about 135,000 students in kindergarten through 12th grade. If ranked by enrollment with school districts in the United States, DODDS would be 11th in size.

All funds for the schools come through the DOD budget. DODDS is under the jurisdiction of the Assistant Secretary of Defense (Manpower, Reserve Affairs, and Logistics), and is administered centrally from Washington through six regional offices. Legislative authorization for DODDS was first provided in 1978, in P.L. 95-561. Further organizational changes likely will take place when the overseas schools are transferred to the Department of Education (ED) in 1983, as provided in P.L. 96-88, the Department of Education Organization Act.

Dependent families are highly mobile with the typical overseas assignment being three years at any one base. Educational programs are very similar to those found in stateside schools, and a sequential curriculum development program is being conducted. Student performance on standardized achievement tests and college entrance examinations is above the national average in all areas. The high schools are accredited by one of the stateside voluntary regional accrediting associations as are several junior high/middle and elementary schools.

The Administration's revised FY 1982 budget request will force DODDS to delay implementation of congressional mandates related to programs for the handicapped, school lunch program expansions, and teacher salary schedule increases.

Other areas of concern are the role and function of local school advisory councils, school construction backlog, and the relative merits of transferring DODDS to ED in view of the shift in Federal policy about education and the heavy reliance of overseas schools upon DOD for various types of services and support.

DEPARTMENT OF DEFENSE DEPENDENTS SCHOOLS

INTRODUCTION

To assure families of military personnel and Department of Defense (DOD) civilian personnel that their children will have access to a quality education at their overseas stations, DOD has established a system of elementary and secondary schools on U.S. military bases throughout the world. The Department of Defense Dependents Schools (DODDS) system is funded by congressional appropriations and is operated as a DOD field activity. The schools are administered and staffed, and curriculum support is provided, through the DODDS office in Alexandria, Virginia. Formal legislative authorization for the schools was first provided in P.L. 95-561 (enacted in 1978) even though the schools have been operated on overseas installations since 1946. In curriculum, student body, and organization, the schools closely resemble many stateside schools, and this is somewhat critical because the overseas tour at a particular base is sufficiently short that students may find themselves attending a new school in a new part of the world every three or four years or even more often.

With 270 schools at 160 different locations situated in over 20 countries throughout the world, about 135,000 students are receiving a kindergarten through 12th (K-12) grade education in schools operated by DODDS. Approximately 11,000 American teachers and other professional and support personnel staff the classrooms, schools, regional offices, and central office of the school system. By virtually any measure, DODDS is a large school district, for it ranks 11th in enrollment when compared with school districts in the United States. In addition to the students enrolled in DODDS, about 8,600 other DOD dependents are enrolled under contractual arrangements with 300 English-language schools located in 150 countries in which DODDS does not operate any school facilities. The typical justification for this arrangement is that the number of students is too small for DODDS to have cost-effective operation of schools in these locations.

A complete grade K-12 educational program is not available at all overseas installations, for some isolated bases do not have sufficient school-age children to justify operation of a high school. These students either attend private English-language high schools (as in the countries in which DODDS maintains no schools at all) or are transferred to existing DODDS schools, where dormitory facilities are provided on either a five-day or a seven-day basis when children cannot commute easily on weekends. Tuition and travel costs are paid through the DODDS' budget as are fees for correspondence courses to supplement programs available for students whose families are stationed in remote areas.

The following discussion provides basic information about DODDS that can be used to facilitate policy discussions. Principal sections of the paper relate to the following aspects of DODDS--brief history, organization, educational program, program evaluation activities, staffing, school construction, transfer of DODDS to the Department of Education (ED), and observations.

BRIEF HISTORY [1]

The concern for dependents' schooling has been an interest of the military since the War of 1812 when General Winfield Scott recognized the need to educate dependents of military personnel. In the westward expansion of the Nation, wives and children accompanied military personnel as they established and maintained military posts on the frontier. Schools were funded from taxes placed on traders and merchants as well as funds provided either directly by the Congress or indirectly through discretionary funds at the disposal of the U.S. Army.

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[1] Summary of Programs. Department of Defense Dependents Schools. April 1980. 68p; Summary of Programs 1981. Department of Defense Dependents Schools (unpublished draft).

Following World War I, when career American troops returned to their families, children were educated at post schools on the military bases or in public schools adjacent to the bases. Post schools came to be recognized by the Congress and received appropriated funds for a period of time. The uncertainty of congressional appropriations forced the base commanders to rely upon post exchange profits, contributions, and donations as revenue sources for the operation of the schools. Since the early 1950s, funds for the schools operated by the Federal government on military bases in the United States and Puerto Rico have been provided through section 6 of P.L. 81-874 (impact aid) and have been sufficient to sustain the operation of the schools. 2/ (These schools are not under the jurisdiction of DODDS.) In some cases, schools operated by a local school district may be located physically on the military base, and these schools are supported jointly with State, local, and Federal funds provided through section 3 of P.L. 81-874. Historically, P.L. 81-874 funds have been contained in the budget for ED (and the former Office of Education), and that agency has administered the program.

Schools on each stateside military base have operated in much the same manner as individual local school districts with the base commander being in charge of the schools. They have attempted to conform to State laws and the rules and

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2/ The Omnibus Reconciliation Act of 1981 (P.L. 97-35) did not authorize any funds for the operation of these schools, but authorized the use of funds from the budget of the DOD for their operation. Section 6 of P.L. 81-874 was not repealed, but no funds were specifically authorized.

regulations of the State educational agency. In FY 1978, 25 of these school districts enrolled 31,780 students.

Following World War II, when military personnel were assigned to overseas stations on a rotational basis, provisions were made for dependent families to accompany personnel. For a variety of reasons, the military services recognized the need to start an education system of elementary and secondary schools for dependents of service personnel. Host nations had different kinds of school systems and military bases were isolated in some cases. Other reasons were that the language of instruction in the host nation's schools often was not English, and dependents would be returning to the United States or going to another overseas station at the completion of the tour. Dependent schools were operated throughout Europe, North Africa, the Middle East, the Phillipines, Japan, Okinawa, Korea, and other areas. Each military service and each major command operated its own school system with the predictable problems of coordination and program differences as personnel transferred from one area to another.

In 1965, the first effort to establish a cohesive standardized school system for overseas dependents was made by issuing DOD Directive 1342.6 to place all DOD overseas schools under the overall policy control of the Office of the Assistant Secretary of Defense (Manpower and Reserve Affairs). The worldwide system was divided into three geographic areas with the Army being responsible for schools on bases in Europe, the Middle East, and North Africa; the Navy for schools in the Atlantic; and the Air Force for those in the Pacific Ocean and the Far East. Three separate offices administered the schools irrespective of the branch of the armed services that might be stationed at the base on which the school was located.

This pattern remained in effect until July of 1976 when Congress placed total operational control of the schools under the overall policy direction of the Assistant Secretary of Defense (Manpower, Reserve Affairs, and Logistics). The Secretary of Defense then established the Office of Dependents Education in the DOD as the unit responsible for administering this worldwide system of schools. In 1977, the Defense Audit Agency performed a comprehensive review and audit of the dependents school system. The principal conclusion of this audit was that changes needed to be made in the existing management organization. As a result of this study, the schools were reorganized into five regions. Support for the reorganization plan was gained from the major overseas military commanders, the various DOD departments, and the DODDS employee organizations. With the addition of schools in Panama, as a result of provisions of the Panama Canal Treaty, a sixth region was formed.

After 30 years of operation without explicit legislative authorization, title XIV of P.L. 95-561 (The Education Amendments of 1978) formally authorized the establishment of DODDS in 1978. This legislation included such requirements as that programs be provided for various groups of special needs children, that school advisory committees and an Advisory Council on Dependents Education be selected, that an annual request for school construction funds be included in the President's budget submission, and that the schools be administered through a separate central office designated as the Office of Dependents Education. Administratively, responsibility for operation of the schools would remain with the DOD.

In the legislation providing for formation of ED (P.L. 96-88), provisions were included that required the transfer of responsibility for operation of the overseas dependents schools to ED within three years of the effective date of P.L. 96-88. Various activities have proceeded for transfer to ED, but legislation has been introduced to repeal that provision of P.L. 96-88 and to keep DODDS in the DOD. This entire issue is further complicated by President Reagan's recommendation that ED be abolished.

ORGANIZATION 3/

The current management organization has been in existence since the 1980-81 school year. The structure consists of a central office in Alexandria, Virginia and six regional offices—two in Germany, one in Spain for the Mediterranean Region, one in England for the Atlantic Region, one in Okinawa for the Pacific Region, and, after signing of the Panama Canal Treaty, one in Panama for the schools serving dependents of personnel stationed at the Panama Canal. Previously, DODDS had been organized into three regions—European Region, Atlantic Region, and Pacific Region. Some efficiencies were achieved with the implementation of the reorganization plan; the number of "overhead" personnel not assigned to individual schools was reduced by 20 percent. The principal savings were achieved by the closing of five subordinate district offices in the European Region and three in the Pacific Region.

Before the reorganization, some imbalances existed in the number of administrators assigned to the regional offices and the subordinate district offices. The reorganization has resulted in the number of personnel being more evenly balanced among the regions with each region having a common organization. In each instance, there is a director's office, an education division, personnel division, logistics division, financial management division, and administrative services division.

In contrast to the coordinative responsibility that existed prior to 1976, the central office is responsible for the overall administration of DODDS. Under

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3/ Report to the Congress on the Organization of the Dependents Education System. Department of Defense Dependents Schools. 1980. 23p.

the current organization, there is one salary schedule with cost-of-living differentials for high-cost locations, a central personnel office for hiring and assigning teachers and administrators, a central education division responsible for curriculum planning and program evaluation, and central offices for fiscal planning, budget submission, and determination of school facility needs. A DODDS report indicates that this change has increased the overall efficiency of DODDS and also has reduced the differences in school programs and curricular offerings that posed problems for students as they moved from one region to another or returned to stateside schools. 4/

Regional directors are responsible for supervising the administration of schools in their region, recommending that schools be opened or closed where circumstances direct, and submitting requests for staff, logistical support budget, and school construction. Because of differences in circumstances among the various schools, schools with identical numbers of students will not always have the same number of staff, and small schools normally will have a lower pupil-teacher ratio than larger schools. Staffing criteria are used by the central office in determining the number of personnel to be allocated to each region.

EDUCATIONAL PROGRAM 5/

Educational offerings in dependents schools are very similar to those found in typical stateside schools. Offerings in grades K-12 are provided in reading, mathematices, science, social studies, language arts, English-as-a-second language, arts and humanities, foreign language and intercultural education, career

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4/ Ibid., p. 6-7.

5/ Summary of Programs, 1980; Five-Year Curriculum Development Plan. Department of Defense Dependents Schools. DS Manual 2000.5. September 24, 1979. 138p.

education, and health and physical education. In the elementary schools, programs generally are similar to those found in schools of comparable size in the United States. At the secondary school level, programs are oriented toward general education and college preparation offerings.

Vocational education offerings are somewhat limited because of the limitations of existing facilities and costs of equipping the various shops; however, offerings have increased during the past several years because arrangements have been made to use facilities on bases as training sites. Most of the high schools have home economics laboratories and limited vocational shop programs. Among the areas in which advancements have been made are data processing and other business-related occupations. An exception to this pattern may be found in Germany where a separate vocational school does provide extensive offerings in a variety of occupational skills. Several schools have established extensive work experience or cooperative programs at various sites on the military installations. Emphasis is placed on exploratory programs and career awareness so that students may make more informed career choices.

Under the provisions of P.L. 95-561, DODDS was directed to provide a free public education of high quality through secondary school for overseas dependents. In addition, DODDS is required to provide programs designed to meet the special needs of handicapped students, those in need of compensatory education, gifted and talented students, and individuals of limited English-speaking ability. If sufficient funds are provided, pre-school programs are also to be provided unless they are otherwise available.

The application of Federal legislation relating to education of the handicapped (P.L. 94-142, the Education for all Handicapped Children Act) to DODDS creates the situation in which Federal mandates will be made applicable to schools operated by the Federal government. Reports from the school system indicate that significant advancements have been made in providing programs for the learning disabled, physically and mentally handicapped, and students with speech disorders. The unresolved issue is whether sufficient funds will be provided to initiate the new programs. 6/

As required by P.L. 95-561, compensatory education is being phased-in throughout the system. In the 1981-82 school year, plans call for the operation of 87 compensatory education projects. These programs resemble compensatory education funded by Federal funds in stateside schools; the major focus is on individualized instruction with an emphasis on tutorial and remedial instruction in reading and mathematics. The goal is that by 1985-86 the system will be providing compensatory education to all students needing supplementary instruction.

Food Service

Recent statutory provisions have authorized the establishment of a food service program in the schools, but the revised FY 1982 DOD budget submissions deleted $8.0 million that had been requested for the alteration of facilities and the purchase of equipment. 7/ These funds were to have been used for the first year of a two-year phase-in for implementation of the food service program. This action will delay implementation of the program until funds are provided.

6/ The revised FY 1982 budget requests for DOD (September, 1981) call for a reduction of $8.0 million in special needs funds for DODDS. If these funds are not forthcoming, planned expansion of programs for education of the handicapped will have to be delayed. Programs and services scheduled for expansion include physical-occupational therapy, audiology, and pupil transportation. This action illustrates the types of problems that educational agencies have in meeting Federal mandates during an era of fiscal retrenchment.

7/ Highlights of FY 1982 Budget Revisions, June 1981 and September 1981. Department of Defense. September 26, 1981. p. 36.

Curriculum Development Plans 8/

Since 1976 when DODDS was formed, considerable attention has been given to scope and sequence in the educational program and greater coordination of program offerings. Leadership responsibilities for the development of a quality education program throughout DODDS reside with the Education Division in the Central Office. Through a task force approach involving personnel from the schools and the regional offices, a five-year cycle of curriculum development plans is being implemented. Under the plan, detailed attention is given to two or three curriculum areas or supplementary services each year. Each task force reviews program objectives, instructional techniques, support materials, evaluational procedures, and in-service training requirements.

Under the schedule, the first three years are spent in development of objectives, identification of appropriate instructional materials, pilot projects using the materials, and finally selection of materials. In the fourth year, programs, with supplementary materials, are implemented in the schools. Evaluations are conducted during the fifth year, and then the cycle is started again. 9/ This system is somewhat similar to that used in many stateside school districts for curriculum revision and textbook adoption.

Even though some critics might contend that high levels of independence should reside at the classroom level, others would hold that this contention is not appropriate for DODDS because of the transient nature of students and teachers, and the consequent importance of consistency both among DODDS schools and between these schools and "typical" stateside schools. The latter group would contend that the schools would be in disarray and students would encounter severe

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8/ Five-Year Curriculum Development Plan, September 24, 1979.

9/ Ibid., p. 17.

problems as they relocated if each school, or even each region, were permitted to pursue a separate course in curriculum development and program selection. Under the system, the intent is not to standardize instruction in the classrooms, but rather is to have a common set of instructional objectives and materials for use throughout the system. Teachers can then use a variety of instructional approaches in working with students to attain the objectives. The professional role of the teacher is balanced against the interest of DODDS in ensuring that its students have access to a quality educational program through which they may progress without having transitional problems as they move from one school to another.

Some of the rationale and justification for standardization of the curriculum may be found in a recent DODDS survey indicating that 45 percent of the students had attended DODDS schools for three or more years. 10/ This information provides some insight into the degree to which DODDS students transfer within the system, for the average overseas tour at one station is three years or less.

PROGRAM EVALUATION ACTIVITIES 11/

The function of the DODDS' central office evaluation branch is to operate a system-wide achievement testing program, conduct evaluation studies of educational programs and other research, and direct the accreditation program for the schools. Much of the work of this branch is closely coordinated with activities involved in the five-year curriculum development plans. Major activities

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10/ Highlights of Results, Basic Skills Achievement Program. Department of Defense Dependents Schools. 1981. p. 2.

11/ Summary of Programs, 1980.

related to the latter include evaluating pilot curriculum materials and innovative instructional programs and monitoring educational program changes.

Student Performance

The system uses a basic skills assessment program to identify areas to which DODDS should devote special instructional attention and to determine how DODDS students compare with stateside students. In a recent application of the tests, DODDS students consistently outperformed the comparison group of stateside civilian schools on all tests at all grade levels. 12/ Performance was especially high in basic reading skills for primary students. At the secondary school level, performance was above the level for the stateside sample, but the tests indicated that additional attention should be given to development of analytical skills, use of symbolism, and development of abstract thinking skills.

For high school juniors and seniors, the College Entrance Examination Board (CEEB) and the American College Testing Program (ACT) are the two major tests used as an indicator of potential for college success. Most colleges and universities use these tests as one factor in making the decision to admit students. For recent years, DODDS students taking the tests have scored higher than the national average on all of the ACT subject matter achievement tests and also on the ACT composite score. 13/ Scores for DODDS students exceeded the national average on 9 of 11 CEEB achievements tests, and the students also exceeded the national average on the verbal and mathematics portions of the Scholastic Aptitude Test. 14/

12/ Highlights of Results, Basic Skills Achievement Program, 1981.

13/ American College Testing Program: Performance of DODDS Students-1979-80. Department of Defense Dependents Schools. 1980. 9p.

14/ College Boards. Department of Defense Dependents Schools. 1980. 8p.

School Accreditation [15]

A matter of continuing concern has been the relative quality of overseas schools for military dependents. Parents and colleges and universities seek assurances about the quality of schools in any situation, but the interest is greater with the overseas schools for military dependents because of the transient nature of military families and geographical dispersion of the schools. In the early days of the operation of the overseas schools, the school administrators and the military commanders determined that an outside agency should evaluate the schools on a regular basis to alleviate some of the concerns about the quality of overseas education for military dependents. Arrangements were made with the North Central Association of Colleges and Schools (NCA) to evaluate and accredit the overseas high schools.

Since 1946, the overseas dependent high schools have been accredited by the NCA. This jurisdiction has been formalized through negotiations among the six regional accrediting associations in the United States. As the largest regional accrediting association in the United States, the NCA accredits over 4,000 elementary and secondary schools in a 19-State area stretching from Michigan and Ohio to Arizona and Colorado and from Arkansas to Minnesota and the Dakotas. When DODDS and its students and teachers were less stable, NCA visitation evaluations were made every two years to each school. Later, the schedule was changed to every three years, and proposed plans call for the schools to be visited and evaluated by an NCA external team on a five-year basis.

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[15] Summary of Programs, 1980, pp. 50-53; Accredited Schools of the Department of Defense Dependents Schools, 1980-81. Commission on Schools, North Central Association of Colleges and Schools. June 1981. 10p.

Currently, all of the 62 DODDS high schools are accredited, as are 7 of the 20 junior high/middle schools and 67 of the 174 elementary schools. 16/ The NCA has been accrediting DODDS junior high/middle schools since 1973, and has been accrediting DODDS elementary schools since 1976. Accreditation of junior high/middle and elementary schools is less critical from the standpoint of the parents and college admission; consequently, the interest in having all of these schools accredited is less. An additional factor is that additional investment must be made in many of these schools so that they meet the quantitative standards related to staffing qualifications, support personnel, and instructional materials. The smallness of some schools because of geographical isolation, need for additional support staff to meet accreditation standards, and lack of additional space for libraries has delayed the applications of several elementary schools.

The evaluations are conducted by teams of stateside educators selected by NCA; evaluation team reports are submitted jointly to DODDS and NCA, with the NCA governing body making the final decision on accreditation. Accreditation decisions on individual schools are based on (1) the findings and recommendations of the evaluation team and (2) the degree to which the schools meet the NCA's quantitative standards. For the years that NCA has been accrediting DODDS high schools, the typical problems have been related to securing qualified staff, encouraging program improvement, and correcting inadequacies of school facilities. In addition to the routine aspects of school accreditation, in a limited number of cases, the NCA has also been called upon to mediate problems and misunderstandings between the military commanders and the schools.

16/ Of the 270 schools operated by DODDS, 20 are K-12 schools in which the high schools are accredited. The system also includes two special schools; one is a vocational school and the other is a special education center.

For DODDS, the principal benefits of the accreditation arrangement have been the use of quantitative standards as a means of justifying additional resources for the schools, the benefits of interaction with stateside educators and mutual sharing of information, and the status of accreditation as an indicator of school quality for the colleges, parents and military command.

STAFFING [17]

Personnel are recruited by and assigned from the DODDS central office. Once selected, professional staff members are employees of DODDS and have transfer rights to available positions in which they are qualified; this results in considerable time being spent in processing requests for transfers in addition to the efforts that must be made to recruit new teachers for vacancies in the system. The length of tours at individual schools is one or two years depending upon the isolation and hardship conditions; however, a teacher may extend or sign up for consecutive tours.

A recuitment brochure is distributed to colleges and universities throughout the United States and also made available to interested parties. Among the qualification requirements for employees are U.S. citizenship, availability for worldwide placement, and professional preparation standards of the NCA which meet or exceed those used to license teachers for public schools in the various States. Preference is given to candidates with recent professional experience and training.

DODDS policies provide that priority for employment be given to qualified locally-available dependent spouses of military personnel or civilians employed by the DOD agency (local hires). After consideration has been given to locally-qualified applicants, the remaining vacancies are forwarded to the teacher recruitment section in the DODDS central office. This action constitutes the authority for hiring of applicants from the United States. In 1979-80, approximately 50 percent of the "new hires" were from the United States.

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[17] Overseas Employment Opportunities for Educators. Department of Defense Dependents Schools, School Year 1982-83. 1981. 21p.

Under collective bargaining procedures, a formal contract has been negotiated between the Overseas Education Association and DODDS. This contract with applicable statutes provides the framework within which DODDS employee-employer relations are conducted. Teacher pay is not among the items subject to negotiations; this matter is subject to the provisions of the Defense Department Overseas Teachers Pay and Personnel Practices Act. Under the Act, salaries for teachers are based on the average of the range of rates for similar positions in urban school jurisdictions in the United States having a population of 100,000 or more. Since the Act has been in effect, minimal problems have been encountered in securing appropriations to support the teachers' salary schedule for DODDS teachers as provided in the statute. However, the September 26, 1981 DOD budget revisions for FY 1982 propose that DODDS teachers' pay be increased by 4.8 percent rather than the 11 percent that would be required to meet the provisions of the statute.

Personnel practices for DODDS employees are in accordance with Department of State regulations pertaining to allowances and benefits for Federal overseas employees. Transportation is provided to the overseas station for teachers, their household goods, and, in some cases, their automobile. On some bases, living quarters are provided. On others, quarters must be secured off the base, and a housing allowance is provided to cover average rent and utility costs. At the end of each tour, transportation is provided to the staff member's stateside residence at the point of entry into service for DODDS.

SCHOOL CONSTRUCTION 18/

The relative quality of facilities housing overseas education programs for military dependents varies from modern well-equipped schools in a few instances to makeshift quarters in temporary buildings. School facilities can be classified into various categories—educationally obsolete, structurally inadequate, permanent, or temporary. In contrast to school districts in the United States, DODDS has no revenue generating power, and new construction must be funded through appropriations by the Congress. The need to provide immediate school facilities in whatever quarters are available, agreements about capital construction with the "host" nations, changing international relations and priorities, uncertainties about troop strength and assignments, and the number of accompanying school-age dependents in various overseas areas have resulted in dramatic differences in the quality of and the need for school facilities in the different overseas areas. If not for the support from military base commanders, the capacity to utilize improvised facilities, and various assistance from the armed services, the school facility problem would be even more severe. DODDS has indicated a current construction needs backlog of between $400 million and $500 million.

Prior to FY 1979, funds for construction of school facilities came from the appropriations for general military construction from the budgets of the individual armed services. Since FY 1979, separate appropriations have been provided for construction of overseas schools. Funding in FY 1979 was $45,490,000; in FY 1980 was $15,850,000; in FY 1981 was $48,351,000; and in FY 1982 the budget request was $64,200,000. 19/

18/ Military Construction (MILCON) Programs. Department of Defense Dependents Schools. September 15, 1981. 5 p.

19/ Ibid., p. 5.

Even though the pattern of funding indicates a continuing commitment, the unmet requirements result in wide variations in the quality of facilities with obvious effects on the capacity to provide a quality educational program. Of course, the problem interacts with the desire of military personnel to have their families with them at the overseas bases and to have their school-age children living at home instead of residing in dormitories several miles from the base, and in some instances thousands of miles from the base. An additional issue is that a period of several years can elapse between the decision to construct a school building and its completion and occupancy. In that period of time, a variety of decisions may be made about troop assignment; consequently, resolution of the school facility problem is much more complicated than might first appear.

TRANSFER OF DODDS TO THE DEPARTMENT OF EDUCATION

In P.L. 96-88, the legislation to form ED, provisions were included that provide for the transfer of overseas dependent schools from DOD to ED. The transfer is to take place within three years of the effective date of P.L. 96-88, presumably May 4, 1983. Support for the transfer was based on education not being the primary mission of DOD and the various types of assistance and expertise that could be provided to the oversees dependent schools by ED. Only limited attention was given to the logistical support that must be provided for the schools by the military commands and potential problems that might arise because of another Federal agency operating schools in isolated military communities scattered throughout the world. Other reasons were that all Federal education activities and functions should be centered in one agency; however, this commitment was not observed in other instances such as the schools operated by the Department of Interior for Native Americans on Indian Reservations. Representatives of DODDS teachers testified in favor of the transfer, but spokespersons for parents both supported and opposed the transfer.

Since the formation of ED on May 4, 1980, staff members in ED have been working with DODDS staff to provide for an orderly transition. In accordance with section 302(c) of P.L. 96-88, on May 6, 1981, ED Secretary Bell submitted to the Congress a plan that describes the administrative arrangements necessary to transfer the overseas dependent schools from DOD to ED. The report refers to a variety of proposed agreements that are considered important for an orderly transition from DOD to ED control of the overseas schools. 20/

DOD Continuing Support

According to the proposed inter-agency agreement between DOD and ED, 21/ the schools will continue to be dependent upon the military departments for related services and technical assistance regarding programs for handicapped students. The agreement proposes that military bases continue to provide sites for cooperative work experience and vocational education. Where possible, facilities such as the base motor pool, machine and metal shop, jet engine shop, and related mechanical and electrical equipment are to be available for use by vocational education students.

ED will continue to rely upon civilian personnel offices operated by the military department for various personnel services to support overseas schools personnel. The agreement also is to provide that overseas schools personnel are to be treated in the same manner as DOD civilian personnel for purposes of

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20/ A Report to the Congress. A Plan for the Transfer of the Overseas Schools for Military Dependents to the Department of Education from the Department of Defense. U.S. Department of Education. May 4, 1981. 15p.

21/ Ibid., pp. 2-4.

access to services and facilities on overseas installations. These privileges are to include access to commissaries and post exchanges, assistance in securing and maintaining tax and custom duty exemptions, automobile licensing, travel orders, identification cards, and other necessary documentation for overseas duty on U.S. military installations. DOD is also to provide administrative control over overseas personnel. The proposals call for reimbursement for services provided through interdepartmental arrangements.

The proposed agreement will also call for DOD to continue financial support services, including payroll and accounting, on a reimbursable basis. Primary responsibility for audit-related functions will reside with the ED Inspector General, but a memorandum of understanding is to be developed between the ED Inspector General's office and the Defense Audit Agency to ensure interdepartmental cooperation on audits and reviews of the operation of the overseas dependent schools.

As an illustration of the degree to which the overseas schools are dependent upon the military departments for logistical support, a master servicing agreement is also to be developed which specifies that DOD will provide for both reimbursable and non-reimbursable support services comparable to those currently being provided. ED is to be responsible for funding all reimbursable support services specified in the interservice agreement currently in effect.

Centralization Issues

Questions are raised in the ED report about the degree of centralization in the current DODDS organizational structure. In essence, DODDS operates as a single school district with the central office in Alexandria, Virginia functioning in much the same manner as the office and staff of the superintendent of schools functions in a large school system. Because of the geographical dispersion of the DODDS, the six regional administrators have more discretion than might be found in many stateside school districts of comparable size. This is considered necessary because of the distance between DODDS and the regions and the need for a balance to be developed between on-site supervision, central administration for the schools, and communication and coordination with the activities of the military departments whose personnel decisions have a direct influence on the operation of the schools.

Advisory Councils

In addition to the provisions in the report concerning agreements between DOD and ED related to the educational program, personnel management, and logistical support, Secretary Bell's report to the Congress also conforms to the requirements of P.L. 96-88 relating to increased school community participation in the administration and operation of the overseas dependent schools. The transfer plan contains recommendations for increased participation by parents, teachers, students, school administrators, and members of the Armed Forces. The Senate Report on P.L. 96-88 recommended that a study be made of the ways in which local-, regional-, and national-level boards of education could function in much the same way that public education policy is determined by boards of education in the United States.

At what would correspond to the national level, provisions are made for the appointment of 12 members of an Advisory Council on Dependents Education by the Secretary of Education, with the Council being co-chaired by the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics and the Administrator of Education for Overseas Dependents from ED. The Council is to include two additional members who are to represent the Secretary of Education and the Secretary of Defense. (Currently, DODDS has an Overseas Dependents Education Council composed of representatives from DOD and the geographical areas served by DODDS.)

At the present time, statutes do not require advisory councils at the regional level, but DODDS advisory groups are functioning in three geographic areas--Europe, Panama, and the Pacific. Participants include DODDS personnel and representatives of the affected military commands.

In accordance with the provisions of P.L. 95-561, school-level advisory councils have been elected and are functioning. These bodies may advise the school principal about the operation of the school, may make recommendations related to curriculum and budget, and may advise the military commander as to problems concerning dependents' education within the jurisdiction of the military commander. In cases where more than one school is under the jurisdiction of the commander, an advisory council for the entire area under the commander's jurisdiction is formed to advise the commander. Under current regulations, both school personnel and parents are eligible for election to the local advisory councils.

Secretary Bell's report to the Congress outlines several alternatives for meeting the intent of the Congress as outlined in the legislative history for P.L. 96-88. Various issues have been identified that merit attention before final decisions are made concerning the advisory structure when the schools are transferred from DOD to ED. One is the relative power that should be given to the advisory councils, the appropriateness of the alternatives for the councils in the overseas schools, and the implications of different alternatives for membership on the council.

The ED report to the Congress contends that a void exists between the local school advisory councils and the single system-wide advisory council for DODDS. Evidently, the existing regional advisory groups were not viewed as appropriate because their membership did not include parents or they were serving more than one region in Europe. If the membership and geographic problems can be resolved, the existing regional advisory councils might meet the report's goal of providing advice the regional school administrators and the affected military commanders as well as serving as a linkage between the school councils and the central council for DODDS.

In many ways, DODDS differs from the situation in stateside local school districts. The schools serve a worldwide area with one employer (DOD), and DOD decisions about periods of assignment and number of personnel are heavily influenced by international relations. These conditions result in the overseas school communities on military bases having considerably less stability than stateside school districts. They are highly transient communities, have virtually no long-term residents, and are not legally-established governmental units with taxing and budgetary powers. Original sources for instructional staff and instructional materials, supplies, and equipment are several thousand of miles away.

These conditions raise certain questions about the advisability of organizing schools for overseas dependents on the same basis as stateside schools. The overseas "school districts" would not have the same discretionary powers as their supposed stateside counterparts. This suggests that an advisory function for the councils may be more appropriate than a decision-making policy function in which the school councils would have authority over educational programs, school personnel budgets, and other areas of school administration and policy.

The council membership issue is of less importance if the councils are to be advisory. If they are to have discretionary governing powers, questions can be raised about the appropriateness of school staff members being voting members of the councils. The generally accepted principle is that persons should not be voting members of public governing and policy boards that employ them or make policy about employment conditions--that to do so constitutes a potential conflict of interest. If the councils retain their current advisory roles, professional staff membership might be appropriate, providing that a balance is maintained between numbers of professional staff members and parents on the councils.

OBSERVATIONS

This section will focus on some of the policy considerations that might be of relevance in congressional hearings related to the current status and future of DODDS and overseas education for military dependents. Principal points of emphasis will be organization, advisory councils, educational program, funding, construction backlog, and transfer of DODDS to ED.

Organization

The current DODDS organizational structure with the central office and six geographical regions appears to be working more effectively than the previous structure in terms of having the regional administrators closer to the schools and reducing the number of schools under the control and supervision of each regional office. The regional office can relate directly to the schools rather than having to establish intermediate level offices because of the number of schools or geographical distance. Some flexibility in staffing assignments has been permitted at the regional level so long as functional responsibilities are met.

Advisory Councils

The nature of the military community, the dispersed location of DODDS schools, the technical governance structure for DODDS, and the mobility of parents and students suggest that a decentralized governance model similar to local school districts in the United States would encounter a variety of difficulties. The culture of the military communities assumes that the base commander is responsible for all activities on the military installation; accommodations and understandings have been developed that permit the operation of schools under the current legal structure.

If the advisory councils in each military community were granted the powers and responsibilities similar to those of stateside local school boards, the councils would then be making decisions about employment and dismissal of personnel, determination of educational program, and budgetary allocations. This would require significant modifications in authorizing legislation, in current procedures, and in the DODDS organizational structure, for each military community would then be a "local school district." In many ways, this organizational pattern would be similar to those in existence during the 1950's when problems of adequate logistical support and coordination resulted in the movement toward greater coordination and consistency among the schools for overseas dependents. Implementation of this type of structure would change the functions and responsibilities in the DODDS regional offices as well as the central office.

Educational Program

The educational programs in DODDS schools appear to be comparable to those found in stateside schools. The continued accreditation of the schools by one of the stateside voluntary regional accrediting associations can be interpreted as an indicator of quality attested to by an outside agency. Variations may be found in the programs because of differences in school size and available facilities, but DODDS appears to have an organized program of curriculum development and improvement. The short period of time that students spend in the individual schools and the movement of the students among DODDS schools, as well as in and out of various stateside schools, would appear to justify substantial consistency in curricular content and instructional approaches so that students may make the transition with minimal difficulty.

On average, students appear to be performing in a creditable fashion in the schools. Achievement test results for all students indicate that student performance is at a rate slightly in excess of national norms, and scores on college entrance examinations followed the same pattern.

Funding

Maintaining adequate funding to meet the requirements of existing legislation and provide programs mandated by legislation appears to be a continuing problem. For example, the September 1981 budget revisions for FY 1982 reduced funding requests for establishing school lunch programs, expanding programs for the handicapped to meet the requirements of P.L. 94-142 and P.L. 95-561, and meeting the statutory pay increases that were to be provided for DODDS teachers. Under the proposed budget cuts, DODDS will be unable to provide the mandated programs and pay increases for teachers prescribed in other Federal statutes. Working conditions are included in the negotiated agreement with the teachers. (In contrast to public elementary and secondary schools in States and local school districts, DODDS has no source of revenue other than Federal funds.) Proposed program expansions for the handicapped and school lunch to meet the requirements of P.L. 95-561 will have to be delayed, and some reductions in DODDS programs and services may be required.

Construction Backlog

Wide variations exist in the relative quality of school facilities provided for overseas dependents. Some facilities have been in use since overseas schools for military dependents were first opened in the late 1940's. Other facilities were designed for non-educational purposes, but later were converted to school use. Quonset huts and other temporary buildings have been used to house both elementary and secondary schools.

Because of shifts in foreign policy and international relations, the likely period of use for certain military installations is somewhat indefinite; however, long-term international commitments may suggest that other installations will be in use, and also will have military dependents, for a sufficient period to justify school construction. Appropriations at the recommended FY 1982 level will relieve only a small portion of the $400 million to $500 million construction backlog. A much higher amount would be required to provide adequate school facilities for overseas dependents in the foreseeable future.

Transfer of DODDS to the Department of Education

Among the matters considered as the Congress was enacting P.L. 96-88, the statute forming ED, was whether or not the new department actually should operate schools. Schools for Native American Indians were left with the Department of the Interior; however, jurisdiction over overseas schools for military dependents was transferred to ED. In view of the Reagan Administration's stated intent to reduce the Federal role in education and to abolish ED, the provisions in P.L. 96-88 relating to the transfer of DODDS may need to be reexamined because of the shift in Federal policy.

Another reason for reexamination of the transfer is that the ED progress report on the transfer indicates a continued heavy reliance on DOD for various supportive services and logistical support. Initial employment for staff and development of educational programs appear to be the major functions that will actually be assumed by ED. The variety and magnitude of proposed interagency agreements between ED and DOD illustrate the degree to which overseas schools are dependent upon the military community and suggest that considerable problems might be encountered under the proposed transfer because of the dependent-tenant relationship that ED would have in the operation of the schools on overseas installations.

Senator JEPSEN. I can assure you, Senator, of my complete and total interest and support. We have discussed this. We both feel strongly about the quality of education. I too hope that we can center in on the children and what the end result of this education is supposed to be.

If you will assume the chair, I will thank you very kindly, and thank you all for coming.

Senator QUAYLE [presiding]. Dr. Jones is the first witness.

STATEMENT OF HON. GARY L. JONES, UNDER SECRETARY, DEPARTMENT OF EDUCATION, ACCOMPANIED BY DR. WILLIAM KEOUGH AND DR. WILLIAM SMITH

Mr. JONES. Thank you, Mr. Chairman.

Before proceeding, I would like to introduce two colleagues, Dr. William Keough, currently the person in the Department responsible for our functional responsibilities for the overseas schools, and on my right Dr. William Smith who has previously been fulfilling those obligations.

Both of these gentlemen, I would like to underscore, have previously held full-time obligations in other capacities within the Department and were doing the overseas schools' function as a complement to their regular activities.

If you would prefer, Senator, I can submit the statement for the record and briefly summarize it.

Senator QUAYLE. I think that would be preferable and I appreciate it.

Mr. JONES. It is obvious, Senator, that the Department of Education ever since the beginning of this administration, advocated that the Overseas Dependents' Schools remain within the Department of Defense. We have worked consistently within the administration with Department of Defense officials, other officials in the administration, and with you and other people in the Congress to see if we can't effectuate a change in the law so the schools do remain in DOD.

Secretary Bell's record is quite evident. Not only does he wish for those schools to remain there; he does wish that the Advisory Council be maintained.

As you know, we endorse your bill in its entirety, with one exception, which is that we would like to see the Secretary of Education maintain a representative on that Advisory Council. Beyond that, Senator, we are in total concurrence with your bill; we are in total concurrence with your interest in quality education for the 136,000 students in these overseas schools.

With that we are open to questions.

[The prepared statement of Hon. Gary L. Jones, follows:]

PREPARED STATEMENT OF GARY L. JONES, UNDER SECRETARY, DEPARTMENT OF EDUCATION

Thank you, Mr. Chairman. I am pleased to represent the Department of Education at today's hearing concerning the transfer of the overseas dependents' schools from the Department of Defense to the Department of Education and to testify on Senator Quayle's bill, S. 1474, to continue the operation of the Defense Department's education system in the Department of Defense.

The Department of Education continues to support the administration's goal of retaining the overseas dependents' schools in the Department of Defense.

I enumerated the reasons for this position in a statement read by Senator Quayle before the Senate on May 6 of this year. This statement included the following:

"The maintenance and operation of the school system is inextricably interwoven with the total Defense operations and to insert a third party into such an interdependent system would result in major inefficiencies. Matters of fiscal control and accountability, personnel relationships, and the logistical support systems necessary to maintain the schools would all have bifurcated policy sources inevitably leading to less than optimum conditions for teaching and learning. . . .

"The Department of Education has little experience in dealing with the sensitivities of foreign country relationships with the military forces. Ensuring that the various benefits now received by overseas employees of the schools under status of forces agreements between the United States and host countries may prove more difficult if the schools transferred to the Department of Education.

"The Department is also ill-equipped to instantaneously adjust logistical arrangements in a far-flung school system and to adequately anticipate the urgency of Defense strategic planning and movement."

The Department's support for repealing the transfer of the schools has been expressed numerous times:

On May 6, 1981, Secretary Bell transmitted the transfer plan for the Defense Dependents' Education system to both houses of the Congress, in accordance with section 302(c) of the Department of Education Organization Act. Among other things, he made the point that the Department of Education had identified a number of significant problems regarding the transfer and subsequent administration of the schools by our agency.

On October 29, 1981, in a joint oversight hearing of the House of Representatives (Subcommittee on Elementary, Secondary, and Vocational Education, Committee on Education and Labor, and the Subcommittee on Investigations, Committee on Post Office and Civil Service), we testified in support of the administration's intention to request Congress to repeal the transfer.

The Education Department also continues to support legislative changes that would transfer the responsibilitiy for the Advisory Council on Dependents' Education (ACDE) from the Department of Education back to the Department of Defense. Current law requires the Council to make recommendations to, provide information to, and advise the Director of the dependents' schools, who is a Department of Defense employee. The only specific function that the Council performs for the Secretary of Education concerns the transfer of the Defense education system to the Department of Education. If that transfer does not take place, no purpose would be served by retaining the responsibility for the Council within the Department of Education.

The Department of Education concurred with the Department of Defense draft to repeal the transfer of the overseas schools and place the responsibility for the Advisory Council back with the Department of Defense. We also supported—with only one exception—the Quayle amendment to the Defense Authorization Act of 1983 (section 1117 of S. 2248). Our objection to the amendment concerned the failure to provide for membership on the Advisory Council of a representative of the Secretary of Education or the chief official of the principal Federal education agency. Certainly, the Advisory Council would benefit from the advice of a representative of the Administration's highest ranking education officer. Before membership of the ACDE was altered under the Department of Education Organization Act, the Advisory Council had three high-ranking Federal education officers, as well as the chairmen of the National Endowments of the Arts and of the Humanities. Since the main business of this council is education, I strongly believe that effective operation of that body requires the addition of a representative of the principal Federal education officer to assist the Assistant Secretary for Defense for Manpower, Reserve Affairs, and Logistics and designated representatives from overseas military commands and educational organizations. While we support the remainder of the provisions in the amendment introduced by Senator Quayle, I strongly urge that S. 1474 be amended to provide for membership of a representative of this Department, as provided in the administration's bill.

In conclusion, let me point out that the transfer of the schools into the Department of Education would serve no unique purpose. As operated and administered by the Department of Defense, the overseas schools provide a sound education to dependents of DOD personnel, allowing them to re-enter public schools in the United States with relative ease after overseas tours. The schools are accredited by the North Central Association of Colleges and Schools, and Scholastic Aptitude Test scores indicate that the student body performs as well or somewhat better than the national average for public schools in the United States. Whatever help the Department of Education might provide in the effort to improve the quality of education in the overseas dependents' schools may be provided just as well—or perhaps better—if the schools remain in the Department of Defense. Both the Department of Defense draft bill and Senator Quayle's amendment provided that the Secretary of Defense, at his discretion, might request from the Secretary of Education information, advice, and technical support concerning educational programs and practices. S. 1474 provides that the Director of OMB, the Secretary of Defense, and the Secretary of Education should take whatever action is necessary to assure the continued effective administration of the overseas education system. Whatever form such a provision may take, the Education Department or principal Federal education agency will always be pleased to respond in whatever way would be most useful to the school system. Our purpose is to help improve the quality of education for all American children, wherever their schools are located.

Thank you for the opportunity to offer this testimony.

Senator QUAYLE. How many people do you have over there right now working on this transition, the supposed transition to the Department of Education of the overseas schools?

Mr. JONES. We have three people in the Department who now have some functional obligations for the overseas schools.

Senator QUAYLE. You have just three people working with that? Are these new people who have been hired recently and what are they doing?

Mr. JONES. Let me, if you will permit, ask Dr. Keough to address that question.

Senator QUAYLES. Fine.

Dr. KEOUGH. As administrator for the schools, I have other almost full-time responsibilities. I do have a full-time assistant who attends mostly to matters relating to the Advisory Council, convening the Advisory Council, and pursuing the various questions and requests they have.

The third person is a full-time secretary.

Senator QUAYLE. What does this Advisory Council do?

Dr. KEOUGH. The Advisory Council's statutory requirement is to advise the Director on policy for operations of the overseas schools. An early statutory task was to assist in implementing a study of the DOD school system; is now underway. The Council also performs other tasks as the Secretary may wish.

Senator QUAYLE. Does this Advisory Council go out of existence once the transfer is made?

Dr. KEOUGH. It depends on the legislation.

Senator QUAYLE. Assuming no legislation, what does current law provide?

Dr. SMITH. It is in fact the Advisory Council based on 96–88. It would stay in existence if the legislation does not change.

Senator QUAYLE. It would stay in existence, but the current legislation also contemplates the transfer of the DOD schools to the Department of Education.

Dr. SMITH. The Advisory Council was designed, based upon the new legislation, in concert with the Department of Defense. The law requires that both the Assistant Secretary and the Administrator of

Education for Overseas Dependents' Schools could chair the Advisory Council. It is a joint effort that has been established as a result of 96–88.

It is the Advisory Council that would remain in effect if the legislation is not changed. So that when the transfer is effected, the Advisory Council will continue.

If the legislation changes, then of course all bets are off.

Senator QUAYLE. Now if the legislation does not change, how many new people would be transferred to the Department of Education?

Dr. SMITH. The entire DODDS system.

Senator QUAYLE. That consists of how many people and will you describe what we are talking about here?

Dr. SMITH. We will be talking about the 11,000 people who are presently in the Department of Defense Dependents' Schools.

Senator QUAYLE. They will all be transferred over to the Department of Education?

Dr. SMITH. Yes.

Senator QUAYLE. Where are you going to put these people? Do you have room down there?

Doctor SMITH. It has been our anticipation that it is not going to occur.

Senator QUAYLE. I am somewhat optimistic, too, but we have to plan. The current law says they are going to have to transfer. I hope you are right. Believe me, I hope you are right. I would like to ask the question as a hypothetical.

If Congress should not go back and change what it says it wanted to do in 1979, if they contemplate the transfer of DOD schools, I am curious where you would put them. Do you have a good idea?

Dr. KEOUGH. I would suggest to you a great majority of people are out in the schools and that the central office is perhaps the smallest percentage of the 11,000. Just as the Department of Defense has to provide space for the DODDS central office, probably we would have to rent space also within the Department of Education if the transfer were to be effected.

Senator QUAYLE. So, do the architect and the people contemplate these people moving over to the building you have now or are they taking your good insight in what Congress hopefully will do and not have to transfer?

Are you prepared to accept these people?

Mr. JONES. By May 1984 we will be prepared to make whatever preparations are necessary, I can assure you, Senator. But we don't contemplate its happening, No. 1, either because your bill will be passed or a similar bill or because we will no longer be a Department of Education.

Third, we have, I guess we can say fortunately or unfortnately in this case perhaps, made space available recently.

Since Secretary Bell has become the Secretary of Education we have reduced our number of personnel by 26 percent. He has had a hiring freeze in effect ever since I came into office in January of 1981 and he still maintains that hiring freeze.

We are located in more than one building, Senator. We have nine buildings with employees in them.

Senator QUAYLE. If the Department of Education does not want this transfer, and I know we are going to hear from Secretary Korb of the Department of Defense, I know what their position is, and I know what the position is of a good majority of the Senators, who favors the transfer of the people from the DOD schools into the Department of Education?

Mr. JONES. We have been trying to figure that out, too.

Senator QUAYLE. Somebody must be pushing this. Who still favors it. I am trying to figure out who the players are going to be in this legislative process.

Who will be the opposition to the bill that we have that basically will retain the management and control of DOD schools in the Department of Defense?

Mr. JONES. Specifically I can't say, Senator. Obviously there are some Members of the House of Representatives who would prefer that the legislation passed be effectuated.

Senator QUAYLE. What interest groups will come out in opposition to this?

Mr. JONES. The last time I testified on this matter there were some interest groups that were against the measure, yes.

Senator QUAYLE. Where did you testify on this?

Mr. JONES. I testified a year ago October on the House side.

Senator QUAYLE. Whose committee?

Mr. JONES. It was a joint committee, the Elementary and Secondary Vocational Education Subcommittee of the full committee as well as Mr. Ford's Committee on Civil Service.

Senator QUAYLE. Are you aware of what those hearings concluded? Did they make any conclusion or definite statement on whether DOD schools should or should not be transferred?

Mr. JONES. Not that I recall, sir. We testified, as well as the Department of Defense officials, that we would like to see the schools remain in DOD. I believe it was more of an oversight hearing as opposed to anything else.

Senator QUAYLE. Did anybody show up to testify that the DOD schools should be transferred to the Department of Education?

Mr. JONES. I would rather leave that question to Dr. Korb because I believe there are people that his people have been dealing with who have advocated that.

For instance, either the National Education Association or the American Federation of Teachers, one of those groups, has been in favor of the transfer, as I recall from that testimony, and one of the associations was against the transfer.

Senator QUAYLE. Let me ask the bottom-line question on the quality of education.

Can you describe for this committee the quality of education that the DOD schools are giving to the children of our overseas personnel?

Mr. JONES. I understand Dr. Korb will address that. If I may, Dr. Keough on our staff can address that briefly.

Senator QUAYLE. Fine.

Dr. KEOUGH. My observation has been that in terms of the normal indicators of quality that the schools have been exceeding by some points in various testing systems, exceeding the norm for the U.S. schools on the mainland.

Senator **Quayle**. Are there any statistics or data that you are aware of—I suppose the most relevant data that the people point to are the SAT scores—is there any kind of comparison you can make with the overseas students and the ones here in the States?

Dr. **Keough**. Yes, there are statistics that have been made available to the Advisory Council by the DOD schools and they indicate that for many years running, certainly since 1976, the average SAT score for students has exceeded the average in the mainland school system.

Senator **Quayle**. The average SAT scores for the children overseas has exceeded the mainland scores?

Dr. **Keough**. Yes, in verbal and in mathematical areas.

Senator **Quayle**. I guess if you use that as any kind of yardstick, you would say that the quality of education in that respect would be better.

Dr. **Keough**. If that is the yardstick, yes.

Senator **Quayle**. What other yardsticks could we use to measure quality of education?

Dr. **Keough**. I am sure that the Department of Defense individuals can give you more of the details, but I would say the effort which they are expending in terms of special education, in terms of trying to meet the needs of the talented and gifted students is impressive in terms of what I have seen in State-side systems. But I would defer to them.

Senator **Quayle**. What other yardsticks should we be looking at to get quality of education?

Dr. **Keough**. That is what I am saying. One measure of students who take SAT scores is how well they come out.

Another measure is how other students are being treated, in other words, students who have certain deficiencies. It appears that the system is trying to make provision for all students.

Mr. **Jones**. Senator, if I may, there are other ways than testing that we can judge quality of education, I believe.

The National Institute of Education has for some time been reviewing 20 years of research to determine what makes an effective school.

What they have found through compiling research is that there are certain ingredients in a school system that lend themselves to quality education or effective schools such as strong leadership at the school base level, the principal in particular, focusing on basic skills instruction; feedback from the teachers to the student; and last making sure that the teacher requires of every student what one might refer to as attempting to attain to the maximum of his or her ability.

Too frequently in education we have not had strong leadership at the local school level. Too frequently there has not been enough feedback. Too frequently we don't ask students to attempt to excel.

If we do those types of things in the State-side school and overseas school, you are going to have quality education. If you look at what makes up an effective school, it doesn't make any difference if it is in the Department of Education and we have oversight over those schools or whether it is in DOD.

They apparently are doing a very good job at this point in time because of the test scores, but there are other things which have nothing to do with Federal oversight of one department or another that can either continue to provide quality of education for those students or improve quality of education.

Senator QUAYLE. Since you would oppose the transfer of DOD schools, what do you think is the strongest argument that will be made for not going ahead with the transfer?

Dr. SMITH. For not going ahead with it?

Senator QUAYLE. Yes. You are opposed to it. Why are you opposed to it?

Mr. JONES. Our testimony pretty well describes it and our Secretary describes it. We think there are logistical support reasons, administrative reasons why they should be retained by the Department of Defense.

It is hard to make a case on how the educational programs of those schools could be strengthened by transfer to the Department of Education.

Senator QUAYLE. In other words, the logistical support and not having the familiarity and understanding with the Department of Defense and the way it operates would be somewhat of a handicap for the Department of Education, is that what you are saying? You might amplify on that a bit.

Mr. JONES. I can read if you wish what the Secretary has said. We don't think we are any better prepared or as prepared to handle the logistical problems that would be incumbent in this type of system that DOD is handling very well now.

There would be the Status of Forces Agreement that would have to be confronted and how that would impact on teachers and other civilian personnel in the schools.

There is the question of simply the administrative apparatus that DOD currently has to help us assist with hospitals and medical treatment for those civilian personnel and other individuals like that over there.

We simply do not see that there is any good reason to require these schools that are providing quality education to students and are being run well by the Department of Defense to be transferred to the Department of Education.

It is interesting to point out perhaps that we are talking about 11,000 people who would become the obligation of the Department of Education and currently we have less than 5,000 full-time permanent people in the Department of Education. We are talking about tripling what our employment role currently is.

Dr. SMITH. I would add to that that the study we did the first year in order to develop a transfer plan pointed out two or three very practical things in addition to what the Secretary said which are true.

The question of dollars becomes extremely critical. The Education Department budget is a budget-line item as opposed to the budget in the Department of Defense. One of the things we discovered, for example, was that we could not handle the fluctuation of foreign currency.

The Department of Defense has its own process by which all its elements may draw on their fund which has been made available to them by Congress in order for them to deal with the fluctuation in foreign currencies.

If there were a deficit, and we have found on two or three occasions the overseas schools at the end of the fiscal year had in fact, because of the problems of logistics which they are presently working on, exceeded its budget by a minimal amount, the Department of Defense by virtue of its similar budget was able to take care of that for them.

The Department of Defense schools are part of the Defense Department's family and therefore it has the protection of the family to take care of the problems that exist within the countries where those schools are presently housed.

It does not make sense to us that we would try to get into a competitive process which clearly would be 3 times as expensive. For example, just to be able to pay them requires either using the system that presently exists from their armed services or the Department would have to establish its own financial accounting system for the overseas schools.

There are only two agencies that have that authority at this moment, the Department of Defense and Department of State. So, we are talking about the initial cost, exorbitant cost, to try to duplicate what is already in existence.

Now, the legislation does say that there would be some option within the legislation to utilize some of the logistics, but the real truth of the matter is that the hidden costs that we found in a transfer of this kind are just enormous.

For example, at a particular Army base or Air Force base if children were to be transported to a function at this point in time the post commander is able to use a vehicle and simply allow them to go as part of the process.

If the Department of Education were to take it over, we would have to have a reimburseable accounting system to pay for that service where now it is handled as a mater of routine by that particular commander of that particular unit.

Senator QUAYLE. Have there been any studies or a cost comparison of what the additional cost would be to transfer these people to the Department of Education?

Dr. SMITH. No, not a real one.

Senator QUAYLE. You are fairly confident that there would be a significant increase that would be levied against basically the taxpayers?

Dr. SMITH. The real problem, as I see it, is that the structure of the Department of Education budget does not accommodate to the requirements of the Department of Defense departments' schools. It just does not.

Therefore, we are really talking about a number of other problems. Now, to add to the money question, what the Under Secretary said about the Status of Forces Agreement, the thing that was discovered was that there were a number of problems and the problems were very practical problems.

Most of the status of forces agreements in the NATO countries are part of the NATO Treaty and that of course is a State Department function. The State Department has told us that they do not expect that there would be any changes in those treaties for something like this because they are functioning to the satisfaction of the Department of State and the Federal Government.

The real problem that DOD schools experienced with their own staff in the summer of 1979 was that in two countries, England and Panama, the expectation was that they were going to try to tax the civilian employees of the Department of Defense for whatever reasons, and the Department of Defense was able to prevent that from occurring.

Now when the transfer takes place they would be Department of Education employees and there is nothing written in the NATO Agreement that speaks to anything other than the Department of Defense support systems and therefore it would be a serious problem, as we see it, for the Department of Education to have its employees in those countries with what I think has been the bone of contention for both the association and the union and the employees being vulnerable to conditions and would not necessarily be reflected in the existing NATO Treaty.

Senator Quayle. Has any one at GAO done a study on the additional cost? Has anybody looked at this? Has the Advisory Council looked at this?

You won't be able to specify, but I know a lot of people have talked about it and we have talked in the Armed Services about consolidation of operations. As a matter of fact, GAO is often critical, why does a separate branch of the armed services have to have its own this and that and everything else.

Essentially what you are saying is that this is along the same lines. If they start getting into separate entities and bureaucratic struggles, it will be costly, potentially inefficient and in the long run we could really see a demise in the quality of education of the children.

I think one of the important aspects that I know will make a major difference to a lot of people in that cost. We will try to explore that a bit either with GAO or somebody who will be able to give us some sort of analysis of the additional cost, not to think of the bureaucratic entanglements, but the actual cost that would be involved in this.

You are saying that no matter what, there will be additional cost to the Department of Education to run this as compared with the Department of Defense and I presume everybody on this panel basically agrees there will be substantial increase.

You simply could not run it as efficiently and at as low cost as DOD is doing.

Mr. Jones. That is correct.

Senator Quayle. Thank you very much.

Dr. Korb, welcome back.

STATEMENT OF HON. LAWRENCE J. KORB, ASSISTANT SECRETARY OF DEFENSE FOR MANPOWER, RESERVE AFFAIRS AND LOGISTICS

Dr. Korb. Thank you very much, Senator. It is a pleasure to be back.

Senator Quayle. Proceed as you like. Your prepared statement will be placed in the hearing record.

Dr. Korb. I will ask that my statement be put in the record. I will just give you the reasons why I am opposed to the transfer and elaborate on it if you would like.

In fact, much of the rationale has already been given very well by my colleagues in the Department of Education.

Essentially I think the transfer should not take place for these reasons:

It won't give us better schools than we have now. In fact, as has been brought out, we are doing very well by any standard of measure that people use to evaluate the quality of education.

Second, it would result in an administrative nightmare. Some of the instances have already been touched on this morning.

Third, it would be a problem for the DODDS' employees living in foreign countries. Again that has been mentioned.

Finally, and this has not been mentioned, it would separate the parents from the school system. As it works now, the parents through the school system to the base commander have access right up to my office when there is a particular problem. Were it to be in a different Department, they would not have access to me.

Because they do have this particular access, we are able to move very quickly to deal with the particular problems.

That concludes my remarks.

[The prepared statement of Hon. Lawrence J. Korb follows:]

PREPARED STATEMENT OF DR. LAWRENCE J. KORB, DEPARTMENT OF DEFENSE DEPENDENTS SCHOOLS

Mr. Chairman and Members of the Committee: For over 35 years the Department of Defense has been educating dependents living in overseas areas. In 1968 Congress established the Department of Defense Dependents Schools system—DODDS—to provide for the long-range educational needs of these children. However in 1979, Congress directed a transfer of these schools to the Department of Education. Mr. Chairman, I firmly believe this transfer should not take place for several reasons. First, this transfer would not give us better schools than we have now. Second, the transfer would result in an administrative nightmare. Third, it would create problems for DODDS employees living in foreign countries. Finally, it would separate the parents from the school system.

There is no compelling reason to transfer the Defense overseas schools to another Federal agency. The Defense schools are meeting a complex challenge and doing well. It is difficult to educate children all over the world, but the DODDS schools are unquestionably a success. Presently, there are over 136,000 pupils enrolled in 271 DODDS schools. These schools, modeled after American public schools, are located in 20 foreign countries. They are staffed by nearly 9,000 educators and administrators.

All of the DODDS high schools are accredited by the North Central Association (NCA), the largest accrediting association in the United States. This record is unsurpassed by any of the 19 state school systems who belong to the NCA. Additionally, 62 percent of our eligible elementary schools are accredited, second only to one other school system in the NCA. We anticipate that 98 percent of all DODDS students will be attending fully accredited schools by 1984.

The DODDS students themselves are the best proof that the schools work well. DODDS graduates are academically prepared for college-level studies. Over a 7-year period, test results show that, on the average, DODDS students achieve higher SAT and ACT scores than students in stateside schools. By all measureable standards the Defense schools are providing "an education of high quality" as Congress requires. There is no educational necessity to transfer the schools.

Moving on to my second reason, the administrative system for educating military dependents is effectively integrated within the Department of Defense support structure. Logistics support to the schools, for example, is provided by the separate military services in conjunction with their military mission. DODDS relies upon engineers in the Departments of the Army, the Navy, and the Air Force to supervise school construction programs. To date DODDS has utilized this assistance to complete 42 major construction projects. We plan to utilize service engineers for an additional $400 million in construction over the next five years.

A similar situation exists for personnel administration and financial management. DODDS requirements are met by the military departments as part of their overall mission. They use their internal resources and procedures to handle the DODDS payroll, procurement expenditures, and other fiscal requirements.

In addition, under Federal law, DODDS is required to provide sophisticated medical services, including physician's diagnoses and physical therapy, for handicapped children. Each of the three Military Departments are providing the resources necessary to meet these needs. In most overseas areas, the trained professionals required to supply such services are not available within the civilian population of the host country. If the Department of Education were to provide these services to handicapped students overseas, the cost would be prohibitive.

It would be extremely costly for the Department of Education to initiate and thus duplicate these logistics, personnel, and medical services in foreign countries by establishing its own support network for the schools. It would be equally inefficient for the military services to continue providing these services if they are required to use another Department's personnel, procurement, and fiscal procedures.

In addition, the transfer of the schools would create difficulties for DODDS employees overseas. For example, under the current NATO Status of Forces Agreements (SOFA), teachers in the overseas schools are afforded special benefits and protections by the host nations, but only as long as the teachers are employed directly by the Department of Defense. A transfer of these employees to the Department of Education would have the following effects:

DODDS personnel would no longer be exempt from immigration requirements.

Next, the shipment of household goods and automobiles would be more difficult.

Finally, such personnel would not be entitled to the rights and privileges they are currently accorded under a SOFA, such as customs and tax exemptions, driving privileges, use of commissaries, exchanges, banks, post offices, medical facilities, and recreation facilities.

A solution to this situation would be to request each host country authorities to extend SOFA provisions to schools personnel. With world-wide recession and high unemployment, many countries have been reluctant to extend SOFA privileges to additional personnel. Our experience is that when the U.S. Government asks for privileges for additional personnel it is usually granted at the expense of some other desired program.

Finally, I am concerned that parents will lose influence and control over their children's education if the schools are transferred to another Federal agency. Parents, teachers, and students now have several means of direct access to senior DOD officials, including myself, through military channels and local advisory councils. This access would be severely diminished if educational policies and philosophies are effected by non-DOD officials largely inaccessible to parents stationed overseas.

For these reasons, I strongly support legislation which would retain the Defense schools within the Department of Defense. On March 26 of this year the Secretary of Defense submitted to Congress a proposed bill to achieve this purpose. I urge the Congress to approve the language and concept of that bill. The bill introduced by Senator Quayle, S. 1474, is also a satisfactory solution with a slight modification that has been explained by the Department of Education in its testimony. I request Congress to rescind the DODDS transfer as soon as possible.

QUALITY EDUCATION IMPORTANT TO RETENTION

Senator QUAYLE. Dr. Korb, I wonder if you might describe for me and for the committee exactly how this works, the DOD schools, your relation to the director, the teachers, the schools. Just outline briefly for us how this whole thing operates.

Dr. KORB. As you know, I handle manpower, Reserve affairs, and logistics for the Secretary of Defense. One of my responsibilities, for which I have a Deputy Assistant Secretary, General Tice, is military personnel and recruitment. In this particular area we are concerned with all the factors that get people to come into and stay in the Armed Forces and carry out their tasks.

We recruit individuals, but we retain families. One of the key considerations that families make in deciding whether or not to make the military a career is the quality of education that will be afforded. Given the large number of forces that we have deployed around the world, the chances are that if you make the military a career, you are going to have to go through a DOD school.

OVERSEAS DEPENDENTS SCHOOLS CHAIN OF COMMAND

Because of that, the DOD schools under the direction of Dr. Stephens, the Director, report to General Tice. The school reports to me. As has been mentioned, Dr. Stephens has a staff headquarters in Washington, some 100 people.

We have 11,000 employees throughout the world corresponding to where our forces are located. Schools are normally located on military bases. There is an advisory committee consisting of parents and teachers that works with the schools.

Problems, if they exist, come up to Dr. Stephens, to me, or to the base commander. For example, whenever I make a trip, or Secretary Weinberger makes a trip, people will discuss the situation.

When we have been informed through our parents that we have overcrowding here, facilities are not adequate here, the children are being bussed—I can take action right away to deal with the particular situation.

DODDS EMPLOYEES TO TRANSFER

Senator QUAYLE. With the contemplated transfer I would presume Dr. Stephens and her hundred people and 11,000 employees would all be transferred to the Department of Education?

Dr. KORB. That is correct.

QUALITY EDUCATION VITAL TO RECRUITMENT AND RETENTION

Senator QUAYLE. Then in talking to new recruits about the policy of education which is important for anybody making a career, what would you do, send them down to the Department of Education?

Dr. KORB. Not only that. I would have to say in all candor that I cannot assure you that I can make sure it will get better. When this administration came into office we had terrible manpower problems. The primary focus was on retention.

I was able to speak to people who were contemplating leaving and say, "I can assure you, I will do all in my power to make sure that these quality of life problems are taken care of."

One of them is the school system. I have been asked questions about the school system. In 9 out of 10 places I go that is a big concern. I can say, "OK, what is the problem?" I can do something about it. In all candor, I couldn't say to them, "Look, if you have a problem here, I can solve it."

I could say, "I can try. I can work with another Department, but essentially it is out of my jurisdiction."

Senator QUAYLE. You are a strong proponent and advocate of a Volunteer Army. You have been before this committee and talked about its recent success and the fact it is working. I believe I am summarizing it correctly?

Dr. **Korb**. That is right.

Senator **Quayle**. I wonder if you might comment on what kind of effect this would have on the Volunteer Army in your recruiting and discussing long-term commitments or even short-term commitments to our men and women who want to serve this Nation?

Dr. **Korb**. I think it would have a very serious impact on retention, not so much on recruiting because people when first recruited do not have families.

TRANSFER WOULD FRUSTRATE MILITARY COMMUNITY

I think what would happen is that there would be a sense of more bureaucracy than necessary, a sense that the Defense Department could not take care of its own. People would quickly sense that. There would be a feeling of frustration when they complained to their base commander who would say, "I would like to help you, but that is another agency's department."

It would be the same type of feeling one might get when going down to the motor vehicle bureau. You wait in line 10 minutes and get up front and then they say, "I am sorry. You are in the wrong line. You have to go over there."

People would sense that. It is not that people in the Department of Education would not be well intentioned, but they in fact would not be able to accomplish certain things. If we have a particular problem, say, of getting children to school, we can tell the base commander to get a bus and send them.

If after the transfer you had that problem, the base commander would have to tell the Department of Education, "OK, do you have money to pay me? If you don't, I can't send the bus."

I think our service members would sense that this would be a situation where special needs could not be taken into account. This would happen when they are most valuable to us, after 8 or 10 years, after all the money we have spent on training them.

The experience that they have gained—and these are the people who operate our complex weapons systems—would be lost, and because of real or imagined frustration, they would decide not to take an overseas tour and would get out.

In the Armed Forces, as in a family, word travels very quickly. Because of that we begin to feel frustrations quickly, and people would take that into account when they made their decision whether or not to stay with us.

RETENTION RATE WOULD SUFFER DURING TRANSITION

Senator **Quayle**. I wonder if you might expand on your statement that the parents are separated from the school system and apply that to the family, particularly I know in Western Europe, anywhere, in Korea, where we have schools and a lot of deployment of troops and their families, of what potential impact this would have, whether it would help the family situation where we are trying to improve the quality of life for our soldiers, quality of life aspect that you find is a very important thing on retention, and whether they are going to stay.

Pay is very important, but also the other things, housing, education, medical care, these types of things all go into whether you are going to have retention of good people.

I wonder if you might comment on the potential damage that could be done here with the parents being separated from the system, also the family and quality of life that we are all interested in.

Dr. KORB. Again, first of all, if the transfer were to take place, you would have a certain period of adjustment, at least 5 years, when we could iron out all of these problems you have spoken about.

During that 5 years while we were expanding our Armed Forces and introducing complex weapon systems, I would say our retention rate would suffer significantly. Then you would move on to the situation that I just mentioned, you would have a feeling that, OK, we have a problem; and we will have problems.

DOD PROVIDES EDUCATION AT ALL ACCOMPANIED TOUR SITES

For example, governments change. Because of that, forces come in and go out. As you know, the Senate now is considering the question of European troop strength. That is going to have an impact on where our people go and how many go. Because we know this, we can anticipate it. We can make plans.

For example, we are already making plans to handle the situation that will arise in Europe from the cruise missile deployment. Because we know that this is contemplated, we can begin to make plans.

Let me give you a specific example of what I am talking about.

One of the cruise missile sites is going to be in Comiso, Italy. Because of our concern for the family, we don't want to send people over there unaccompanied. Last year in the budget I was able to make the decision, because I handled military construction, to take money that would have gone to schools in Signello and use that money to build a school at Comiso because we want the people who go there to take their families.

Were that not the case, somebody could say to the Signello school that we would make some other decision, and they might not put the money in the correct place. But because we knew what was contemplated, and because I know how strong the Defense Secretary feels about the schools, we were able to make the correct decision.

I think that is what you would lose.

DOD MEETS NEEDS OF HANDICAPPED DEPENDENTS

In the case of a handicapped child, for example, we are able to use the very fine medical facilities of the Armed Forces in foreign countries to deal with those particular children and their needs in the education system.

Again, another agency would have to go to a foreign country and possibly contract for this.

ORGANIZATIONAL COMPOSITION OF DEPENDENTS SCHOOLS

Senator QUAYLE. Of the 11,000 employees, how are they organized? What is the breakdown and how are the teachers organized?

Dr. KORB. What you have essentially is the headquarters and five regions around the world. You have teachers, administrators, principals, regional directors and assistants in each area.

For example, we have a Pacific region. We have a director in charge of the Pacific region. He has a staff and particular school functions like school functions in this country.

We have people who are full time, and we have substitute teachers whom we have to call most of the time from military dependents, which is another benefit.

I say, "I want priority given to military dependents in hiring," because I want the wives or husbands to be able to have a job when they are in a foreign country. Another reason people do not like to deploy is that their spouses cannot get jobs.

TEACHER-UNION AFFILIATION

Senator QUAYLE. How many are teachers?

Dr. KORB. We have 8,000 teachers.

Senator QUAYLE. How are they organized? Are they all part of a union?

Dr. KORB. We just had an election.

Senator QUAYLE. Of all 8,000?

Dr. KORB. That is right. They voted by regions. The National Labor Relations Board said rather than have one union, they were allowed to vote by regions. We have the Overseas Education Association in four regions, and OFT represents two regions.

Senator QUAYLE. Is OEA connected with NEA?

Dr. KORB. Yes, and OFT is connected with the American Federation of Teachers (AFT).

Senator QUAYLE. OEA has four regions and AFT has basically two?

Dr. KORB. Yes.

Senator QUAYLE. They are not equal in numbers?

Dr. KORB. No.

Senator QUAYLE. I am trying to figure out which one is the largest.

Dr. KORB. OEA is the largest.

Senator QUAYLE. Is it maybe 6,000 OEA? Is that a rough figure?

Dr. KORB. That is pretty good.

GAO REPORT REGARDING DEPENDENTS SCHOOLS

Senator QUAYLE. Dr. Korb, the General Accounting Office completed a study on the managerial effectiveness and the organizational efficiency of the DODDS system. They did find a number of weaknesses in these areas and did recommend some management control be strengthened.

I wonder if you might be willing to comment on this report, particularly on the aspect of the quality of education?

Dr. KORB. First of all, as far as I can ascertain it has not affected the quality of the education. For example, test scores have not gone down. In fact, we are doing so well that when we released our test scores this year for the scholastic aptitude test, it was picked up by CBS News. On the evening news they mentioned how well we did compared to the students in the States.

I was aware of the fact that there were problems and in fact was already moving in most of the areas that GAO recommended to deal with the management system. I think part of the reason we were not moving more vigorously was that after the Department of Education was created there was a kind of hiatus; nobody had taken charge.

When I moved in, I moved in under the assumption that hopefully your bill would pass, and even if it didn't, we couldn't wait any longer because we could not take a chance on the education of the children suffering.

The report came out in November. In our response on January 4 we pointed out that problems have been identified, that we are moving on these problems and have plans for dealing with them.

Since Dr. Stephens has taken over she has reallocated people to these particular areas to make sure we can accelerate the improvement. In fact, this was done before the GAO report came out.

COSTS ASSOCIATED WITH TRANSFER

Senator QUAYLE. Are you aware of any studies that GAO or anybody has done on what the additional financial cost will be if this transfer were to go through?

Dr. KORB. I am not.

Senator QUAYLE. Could you give us your opinion from a managerial point of view?

Dr. KORB. I would say that the budget, which right now is about $500 million, would go at the very least to $750 million and probably a billion dollars. It would be 100 percent, almost, increase.

Senator QUAYLE. That is based primarily on logistics, efficiency, the example that they would have to be charged for transportation, et cetera? Is that basically it?

Dr. KORB. Yes. In a sense you would have to create another organization or parallel structure. It is not just a question of being charged. You have to have another group doing this.

Because of the fact that we are the Department of Defense, we maintain a lot of the systems already. We already have the Defense Logistics Agency, for instance, while the Department of Education would have to create its own logistics apparatus.

We do use the services of the Defense Logistics Agency, which also works for me. When I came in we had some problems ordering and getting textbooks. I worked with Dr. Stephens and said, "OK, this is our problem. Let us solve it," and we were able to make progress in that area.

TEACHERS AND PARENTS OPPOSE TRANSFER

Senator QUAYLE. Just one final sort of opinion from you.

I would like you to describe if there is a consensus among teachers, among the parents, among people who are connected with the schools, as to their feelings. Do all those groups prefer to stay in DOD?

Dr. KORB. Very definitely. The parents make it loud and clear to me no matter where I go that they don't want to go to another Department. They recognize that they would lose this control I am talking about.

The teachers want to stay in the Department of Defense. I have heard that. I went to a couple of administrative conferences and spoke to the people. I mentioned that I thought the departments schools would stay in DOD, and in Berchtesgaden last Setptember when I mentioned it, everybody got up and cheered.

I was surprised. I thought there might be some sort of skepticism, that they might be under the impression that the bureaucrats back in Washington were trying to push it the other way. When I expressed my views, they were very, very happy to hear them.

I have met with the regional administrators each time they have come back to Washington, I have met with them individually and as a group. I asked them, "How do you feel?" To a person, they all want to stay in the Department of Defense.

COMPREHENSIVE STUDY OF DODDS

Now Congress, as you know, mandated a comprehensive study of DODDS that is being carried out by Advanced Technology, Inc. The study, which was begun last spring, is not complete; but when they asked various groups, they said they were very happy with the situation right now and didn't want to change it.

One of the things that surprised me is that almost 80 percent of the teachers were either satisfied or very satisfied. Now, that is much higher than you get in the State systems.

I know of nobody within our system that really would like to see the transfer. In fact, when they recognized that people back here in Washington shared their feelings, they were pleasantly surprised.

Without overstating my own importance, the people said they never realized that an Assistant Secretary would be concerned about something like that or would come to an administrative conference.

ADDITIONAL COMMENTS BY ASSISTANT SECRETARY KORB

I was very concerned about the retention problem. I recognized dependents education was a key ingredient, so I focused a lot of effort on this particular organization.

I spent one Saturday with Dr. Stephens' headquarters staff on what we would call a management retreat, going over every single aspect of the way they do business. I can tell you some of the textbooks, for example, that are used by people in different grades. That is the level of detail, we went into on how they ordered textbooks and how problems were handled.

Senator QUAYLE. Thank you very much.

Dr. KORB. Thank you, Senator.

Senator QUAYLE. Mr. Jack Rollins, president of the OEA. Welcome Mr. Rollins, you may proceed as the other witnesses have.

STATEMENT OF JACK ROLLINS, PRESIDENT, OVERSEAS, EDUCATION ASSOCIATION, ACCOMPANIED BY COL. RONALD R. AUSTIN, USAF (RETIRED), EXECUTIVE DIRECTOR AND GENERAL COUNSEL, OVERSEAS EDUCATION ASSOCIATION

Mr. ROLLINS. Thank you, Mr. Chairman.

Accompanying me is Mr. Ronald Austin. As you know, I am Jack Rollins, president of the Overseas Education Association. We do represent approximately 6,000 teachers in four regions under the Department of Defense schools. This represents more than two-thirds of the total teachers.

I might add for the record that there are not 8,000. I have data that I will share with you——

Senator QUAYLE. How many are there?

Mr. ROLLINS. Could we wait until we get into cross-examination on that, sir?

Senator QUAYLE. How many teachers are there?

Mr. ROLLINS. A little over 7,000, roughly 5,000 classroom teachers.

I might add I have been a teacher with the Department of Defense schools, myself, for 18 years. Prior to becoming president I was a teacher in Misawa, Japan.

I do view this as a unique opportunity to speak to members of the committee on the overseas dependents' schools.

I would like to submit for the record a detailed presentation I have typed and presented to the Chair outlining our objections to the administration of overseas schools and a similar report by the Department of Education. I would like to submit both of those for the record.

Senator QUAYLE. They will be incorporated in the record.

(See p. 79.)

Mr. ROLLINS. Today my comments will focus on teacher concerns about the DODDS system. Teachers in DODDS are perceived to have an enviable opportunity to see the world while teaching overseas. The reality of teaching in DODDS is quite different. The contrast between the image and the reality is quite stark.

Teaching overseas in a DODDS school means ever-increasing class sizes without any expectation that the school budgetary situation will improve. Teaching in an overseas school means waiting two or sometimes an unbelievable 3 years for materials and supplies.

Teaching in a DODDS school means teaching in a dilapidated school building with inadequate facilities for your students. Teaching in the overseas schools means you can't be certain when you will be paid. That may sound incredible, but it is not.

A teacher in Oslo, Norway, has his or her paycheck processed through SHAPE Headquarters in Belgium. Many times it is late. The same applies to personnel records. The fact is that personnel management in DODDS is highly decentralized and relies on civilian personnel offices in the United States and overseas for support.

DODDS does not have a comprehensive system to collect accurate and comprehensive data on students or personnel at regular intervals. (Reference GAO Report, HRD–83–3, dated Nov. 4, 1982; and ED Report, May 4, 1982.)

Teaching overseas in a DODDS school means inadequate housing and living quarters. Teacher status carries a low priority; the result is inadequate and inconsistent housing arrangements. DOD uses discriminatory housing policies for teachers. The medical treatment for teachers overseas in inadequate.

In many instances teachers are provided medical services only on a space available basis. To say the least, the inconsistent access to medical treatment available to overseas teachers is discriminatory.

Teaching overseas in a DODDS school means increasing job responsibilities without just compensation. Teachers are given additional extracurricular assignments without compensation. The evaluation system utilized by DODDS is inadequate and is often viewed a harassment tool.

For teachers who are interested in advancement the DODDS' promotion system is a farce. Although Public Law 86-91, Defense Department Overseas Teachers Pay and Personnel Practices Act, created the personnel authority for teacher pay schedules, appointment procedures, methods of employment, and the personnel operation and payroll system, teachers feel that the system as administered by DODDS is inept.

The training programs for teachers are inadequate and the certification and recertification program is frankly a joke.

The recruitment procedures used by DODDS deserve comment. If I may take a few minutes of your time to explain the DODDS recruitment system, the order in which DODDS places teachers in vacancies each year is as follows:

First. Presently employed—conditional or career teachers have priority in retaining their positions in a particular school if the position continues to exist.

Second. Presently employed full time—indefinite teachers have priority in retaining their positions in a particular school if the position continues to exist.

Third. Participants in the interregionals transfer program have priority in filling the remaining vacancies over local hires and stateside hires.

Fourth. So-called locally hired dependents of military and DOD civilian personnel have priority in hiring for remaining vacancies over stateside hires.

Fifth. Teachers hired stateside have priority for the remaining vacancies over local hires/tourists.

Sixth. Local hires/tourists hired in an emergency should receive the last consideration.

Such a system designed to serve the needs of a school system worldwide can work only if there is a comprehensive centralized system to match the information about vacancies and qualified applicants within all of the above categories.

DODDS has not such a comprehensive management system. As reported in the Department of Education's report on the overseas school transfer plan, the selection of school personnel varies greatly depending upon whether the personnel are being transferred, hired locally, or recruited from the United States. There is not a consistently applied policy for employing teachers.

I would like to make two additional points in this area. Career teachers, although theoretically eligible to apply for transfers to other schools, find, in many instances, that the vacancies are not reported until after the closing period for transfers has expired. This, in some years, has meant anywhere from 400 to 600 vacancies being denied to transfer applicants.

A teacher in the overseas schools—despite the romantic image back home—is often frozen into a single teaching position with little opportunity for either advancement or transfer.

The last point in the area of teacher assignments and transfers concerns teachers who are hired stateside by DODDS. In some cases these teachers are hired in April, but because of the slowness of the DODDS processing system, are unable to arrive at their assigned school until November.

These teachers miss the beginning of the school year; their students suffer; and to compound the whole comedy of sloppy hiring practices, the teacher may find that the actual assignment is in a field for which he or she may not be qualified—in which case, the teacher and students suffer for the ineptitude of DODDS.

The entire personnel management system of DODDS deserves further study by Congress. It is not too much to ask that the men and women employed to teach the children of our service personnel overseas be hired and employed through the most efficient and even-handed system possible.

I would suggest that since DODDS' personnel authority originated through congressional action, Congress, through your committee, thoroughly review what DODDS has produced.

In the area of transfer procedures, I would suggest a negotiated system between teacher representatives and DODDS through which teachers can apply and compete for vacancies in the world through a system made up of procedural requirements based on qualifications and points.

DODDS has a poor record in the area of collective bargaining and grievance processing. If teachers have justified grievances, DODDS' attitude seems to be centered around refusing all grievances with the intent of forcing arbitration. There is very little attempt to resolve issues at lower levels, nor is there any process for resolution at regional or national levels.

Basically, the only time the OEA has any success in getting DODDS to fulfill its obligations to its employees is by suing the Department in court, through arbitration, or through the Merit Systems Protection Board and Federal Labor Relations Authority. Even this process is problematical because DODDS has refused to do what the arbitrator, the MSPB, and the FLRA have ruled they should do.

On the subject of bargaining, despite the law which requires negotiations on all policies that affect employees, DODDS has consistently refused to recognize OEA's right to bargain. During the negotiations which do take place, DODDS uses bureaucratic delay to complicate the bargaining process.

The OEA argues that teachers in the overseas schools should have the same bargaining rights as other Federal employees. It is clear that DODDS' management's philosophy is intent on thwarting the bargaining process at every level. The latest result of this is the Executive order dated November 4, 1982, preventing negotiations in overseas areas on issues related to status of forces agreements.

Another concern of teachers is that schools are moving to the practice of hiring employees other than teachers to perform the teachers' classroom responsibilities. Substitute teachers and aides, paid less than certified teachers, are being placed in classrooms to teach.

In a worldwide system with decentralized and haphazard administrative procedures such as DODDS, it is easy to see how schools are allowed to shortchange their students with unqualified instructors. In some cases, budgetary restraints force the school to use such methods.

Frankly, it is not surprising to see schools cut corners. They are forced to operate on shoestrings. For your information, DODDS has not developed, to my knowledge, a specific budget allotment formula as required by Public Law 95–561 for determining the minimum funding necessary for operating each school in the system.

As a result, school principals are forced to make do. It is a sad commentary that our overseas schools will have to make do because DODDS has not met its statutory and educational obligations.

I will conclude by saying that DODDS teachers seek a managerial system educationally oriented and sympathetic to the welfare of teacher and student. It may seem unusual for me to be advocating the transfer of the DOD schools from the Department of Defense to the Department of Education when many are saying, "Stay with Defense—they have all the money this year."

There is no evidence either through past practice or present commitment that DODDS will truly prioritize the educational programs provided to the children of service people overseas.

I believe the Department of Education offers our students a better education. The Department of Education can offer us a more educationally oriented budget that would offer the different title programs along with additional moneys for specialists and training needs.

The Department of Education can offer us more adequate logistical support with improved and better managed interservice support agreements with the military; the Department of Education can offer us the opportunity to grow in conjunction with other Government school programs, such as the section 6 schools; the Department of Education can offer us the opportunity to fully participate in the education process by being members of curriculum committees, advisory committees, and North Central evaluation committees; and by honoring the Government's obligations in the full faith collective bargaining arena.

The Overseas Education Association supports the Department of Education and supports the transfer of the Department of Defense dependents' schools into the Department of Education.

The Overseas Education Association waits for the day when teaching overseas comes close to its stateside image. Improvement in the management of the overseas schools can only mean that the students in those schools will be receiving the education they deserve.

Let us not forget that the primary purpose for the transfer of DODDS into the Department of Education is to guarantee a higher degree of quality education for children attending the Department of Defense schools overseas.

The focus of this hearing and congressional action should be on the quality of the programs offered to the children served by the overseas schools.

The GAO report and the Department of Education's transfer plan raise serious questions about DODDS' management of the schools. I respectfully request that Congress insist that DOD be made accountable for the inadequacies of its education program as documented by these two reports.

If I may, sir, I would like to comment on some statements made by previous speakers.

Senator Quayle. Certainly.

Mr. Rollins. You, sir, questioned where do you put all these people if the Department of Defense school system is transferred to the Department of Education.

The only movement necessary would be the change in office of one staff.

Senator Quayle. They answered that. They said the staff here of about 100 people.

Mr. Rollins. That is right. They are in a building called the Hoffman Building. I am sure the Government provides funds regardless of the agency that rents that building.

You asked who favored the transfer. You know OEA and NEA do. Instead, in addition, I might add that Congress by a majority has favored it. So does the National PTA and so does the National School Board Association. I think those are pretty powerful groups that speak in favor of it.

The question was brought up about SAT scores. There is no refuting the idea that scores are above the national average. It only speaks to the credit of our students and our teachers, not the administration.

I might add, though, you should take into consideration that our students are transferred. That means they receive the benefits, the majority of them, of the stateside schools. As they come into our school system they bring with them that experience and knowledge they acquired in the stateside schools. Therefore that could be a factor in higher test scores.

The concept mentioned by Dr. Korb in reference to the question on parents' access to the schools, and without providing my assumption or my opinion or my theory, I think there is a clear intent on the part of the people involved in this transfer question that not only do they want to retain the Department of Defense schools with the Department of Defense, but they would like to see the schools put back under the jurisdiction of the military.

Congress thought it was necessary many years ago to consolidate the schools out of the authority of base commanders into a commandwide and eventually to an agencywide level under the Department of Defense dependents' schools with a director and civilian separate from the military.

Lately the military has succeeded in gaining some access to the schools with the appointment of General Tice. I know there is a movement afoot that they are going to try to consolidate section 6 schools with Department of Defense schools and put them all under the umbrella of the military. That is only my professional opinion, sir.

Now I am open to any questions.

[The information submitted by Jack Rollins appears in appendix 1, p. 79.]

Senator Quayle. I am interested in the quality of education. We now have had the Department of Education officials say they are getting a good quality education. They didn't go so far as to say better, but they said it was good. The yardstick as far as SAT scores is better than at stateside.

We have had the Department of Defense say that they felt they were doing an adequate job and they talk about retention. He says that he knew at least administrators, the parents, some teachers and from a family orientation of the military that those people felt they ought to be kept in the DOD schools.

How important is the parents' attitude in the military whether they ought to have them in DOD or Department of Education? Is that a fact we ought to consider?

Mr. ROLLINS. There was a movement with the legislation creating the Department of Education to give access to the parents and teachers as advisory groups to the educational system in DODDS.

When they created a National Advisory Council and sublevel council or committee the intent was to give the parents and the teachers some avenue in recommending to the administration and the military their concerns about how the schools are run. That legislation, as you know, passed.

Now, subsequent to that when they addressed the same issue with the section 6 schools they succeeded in getting boards of education created rather than advisory councils. Boards of education are made up of only parents elected by parents and they divorce teachers' voices from those boards.

I don't think that is the intent of the Government at large, but again in my professional opinion I think that is exactly what will happen with DODDS if DOD retains it, it will become boards of education. Parents will have their voice, but I have a concern about parents having a voice with a commander of a base who supervises the husband or the wife.

How much of a voice does an enlisted man or an officer have with the base commander in decisionmaking? I wonder if the section 6 board of education would be patterned by having the board made up of parents who answer to the base commander.

I certainly don't want to see that happen. I think parents deserve a voice in the school system and they have a right to be concerned as well as teachers. I would hate to see either one divorced from having any voice in it.

Speaking on the quality of education aspect, teachers, and I give credit to our teachers because they do an excellent job in educating those students, are having problems because we have moved in our school system away from the national norm.

It used to be, and I have figures here that support it, that as early as 1961 and 1962 the overseas school had a better PTR ratio than the national norm. It was roughly 22 to 1 and the national norm was 27.9 to 1. That is classroom teachers.

Now this very year the ratio is at the national level 18.4 to 1 and in DODDS it is 24.3 to 1. Now, why would DODDS move in the opposite direction if they want quality education and it seems that the intent of the population at large to recognize quality of education does come about from more individualized concentration on students.

I also have figures to support that we have a ratio of 1 classroom teacher to 1.2 support personnel in running our system. What I mean by support personnel is those people who are administrators and secretaries and counselors and librarians and education specialists outside. They run the school system and support the school system outside the classroom.

We are saying to run the school system for every classroom teacher we have 1.2 support personnel. For every classroom teacher on a national average we have 18.4 students in this country, but DODDS has 24.3. Now, what that means is that many of our classroom teachers are carrying loads in excess of 40 students because of the way our school system is set up, we have a lot of small schools that require staffing and so the PTR's would be lower.

So, they have the large schools carrying the load. That was not the intent of the legislation. The intent of Congress when they passed legislation creating DODDS said to staff those schools on the need of the schools. DODDS staffed schools on the OMB's recommendation of a 25-to-1 ratio.

In addition, if I may make my spiel, they even like to use our own public law staffing ratio to hire administrators. We have 123 administrators worldwide who occupy Public Law 92-91 slots. That means 123 fewer teachers.

Senator QUAYLE. Of the 6,000 teachers you represent how many of them support this transfer?

Mr. ROLLINS. As president of the Overseas Education Association, I speak for all of them in our unit.

Senator QUAYLE. All 6,000?

Mr. ROLLINS. All 6,000 of them right now. I imagine if you went out and polled an individual teacher, you might find exceptions to our position but I speak for 6,000 teachers.

Senator QUAYLE. That is a revealing statistic. If that holds up, I will take notice of it, if all 6,000 teachers want to be transferred over to the Department of Education.

Thank you very much.

Mr. ROLLINS. Thank you, sir.

Senator QUAYLE. Mr. Foley, Ms. Hill, Mrs. Cook, and Ms. Shurtleff. All of your statements will be incorporated in the record.

You may go ahead. We will begin with Mr. Foley.

STATEMENT OF HENRY FOLEY, COUNSELOR, TORREJON HIGH SCHOOL, MADRID, SPAIN

Mr. FOLEY. Mr. Chairman and members of the committee, thank you very much for inviting me to address what I consider to be a very important issue.

First of all, I would like to say that I strongly recommend that the dependents' schools stay with the Department of Defense. I feel a change would mean minimal parental involvement and input, and it would also run contrary to the concept of local control of education.

I think right now, despite what you have heard, we have a good school system. DOD has been responsive to our educational needs, and funding has been adequate.

With the change to the Department of Education, the funding would no longer be controlled by the agency primarily served. I see this as a serious disadvantage. The support system for logistics, supplies, and facility maintenance would have to be drastically revised.

The potential loss of benefits to teachers would be significant. As DOD employees we are covered under the civilian components of the status of forces agreement. We would no longer be under that.

Finally, a transfer from one agency to another would serve no useful purpose. I feel that it would be disruptive to the educational process.

Thank you.

[The prepared statement of Henry J. Foley follows:]

PREPARED STATEMENT OF HENRY J. FOLEY, COUNSELOR, TORREJON HIGH SCHOOL, MADRID, SPAIN, DEPARTMENT OF DEFENSE DEPENDENTS SCHOOLS

Mr. Chairman and Members of the Committee: I am Henry J. Foley a high school counselor at Torrejon Air Base, Spain. I have been a teacher and counselor with the Department of Defense Schools since August 1960, assigned to schools located in Japan and Spain. I am married and have three children all of whom attend DOD Schools.

I, along with the vast majority of teachers, strongly recommend that the overseas schools remain under the Department of Defense. Removal of the schools from Defense to Education would diminish parental interest and involvement. DOD has consistently been attentive to our needs, and the funding for educational programs has been adequate. DOD has sponsored the school program for over 30 years. The support systems of logistic, supply and facility maintenance which have developed over the years would need to be drastically revised if control is moved to another agency. Teachers have expressed concern because the potential loss of benefits appears to be very significant. Civilians are included in the status of forces agreements which define rights regarding ID cards, APO mail, local country taxes, car registration, gas coupons, use of exchanges, etc. Only the Departments of Defense and State have formal recognition with the host nation. Could the Department of Education protect these privileges which are essential to maintaining a teacher work force?

I see no educational or logistical advantage in changing from Department of Defense to Department of Education.

Senator QUAYLE. Ms. Hill, may we hear from you?

STATEMENT OF NANCY LEE HILL, EDUCATOR, SEOUL AMERICAN HIGH SCHOOL, SEOUL, KOREA

Ms. HILL. I am in a high school in Seoul, Korea. I am a teacher of mathematics.

I have my statement to put in the record.

I think Mr. Foley has certainly expressed my thoughts. I am really here to tell you that I think our education system in DODDS is outstanding. We certainly have proof in many ways that the SAT scores—I even have my scores from that particular school with me—are much above the average in the stateside schools.

I find that when the students come in mathematics—I am really speaking in my area as far as this particular subject is concerned—8 children out of 10 I will say are behind in mathematics at the high school level. So when they come into the DOD system we have to give them some extra work so that they can catch up in their math classes.

I hear from these students quite often after they leave the schools. Of course the good ones are the ones that write, I am very much aware of that, but they do write me and tell me how confident they feel in their classes and how well they are doing. I think that in addition to the test scores some personal feedback from the student is very important.

We find that in Korea families come there and are not really quite sure what they are going to get into. Then we find those families ask to be extended because they want their children to continue in our schools. This happens quite often. So, the children are able to stay in the high school if the family can extend another year or two there.

I feel that we have not only an adequate system, we really have an outstanding system.

I am sorry to hear how unhappy I am, from the last report. I didn't realize that things were so bad. I haven't had that experience.

[The prepared statement of Nancy Lee Hill follows:]

PREPARED STATEMENT OF NANCY LEE HILL, TEACHER, SEOUL HIGH SCHOOL, SEOUL, KOREA, DEPARTMENT OF DEFENSE DEPENDENTS SCHOOLS

Mr. Chairman and Members of the Committee: I have been employed by the Department of Defense Dependents Schools (DODDS) as a mathematics teacher at Seoul American High School (SAHS) for 11 years. The experiences of being a DODDS teacher are unique and stimulating. The school environment is pleasant and exciting, the students, on the average, are intellectually curious and, in our particular area, are of a high caliber of ability. Career progression is encouraged by the administrators, if the qualifications for the positions are met and if the person applying has the ability and the desire for advancement. This is especially true for someone who will accept positions at any level anywhere in the world.

In my experience, I find that the support and concern by the administrators is very satisfactory. This is most conducive to an enjoyable teaching and learning atmosphere. The teachers have an appropriate say in the administrative procedures of the school in determining the curriculum school policies, master schedules and purchasing of supplies and books. The curriculum review board consists of teachers, parents, and students that operate within the school to review the various departments and to make suggestions to the administrators. These recommendations are jointly discussed by both the committee and administrators with the improvement of the school program as the primary aim. The inservice committees provide the administrators with suggestions toward inservice activities. On a whole, these have been an avenue of information for the teachers.

For the last several years Michigan State University and Boston University have given excellent classes outside the duty day. These are not mandatory but are heavily encouraged by DODDS providing tuition assistance and selecting topics in which the faculty are interested.

a. Reading—language arts.
b. Gifted and talented.
c. Special education.
d. Computer programing.
e. Public Law 94–142.
f. Management of stress.
g. Drug and alcohol abuse.

The DODDS schools in the Pacific are accredited by the North Central Association of Colleges and Schools (NCA). SAHS will be evaluated by NCA again in 1984. The process of self-evaluation is a valuable tool to the improvement of the teaching methods and to all areas of the program that involve students.

According to our information on the S.A.T. and A.C.T. testing programs, the students of the DODDS school system have scored above the national average of stateside schools, and the Pacific area scores are above the average in the DODDS system. In our particular case, the students of SAHS have scores above the average in the Pacific Region.

DODDS MEETING NEEDS OF "COMPUTER AGE" AND "HIGH TECHNOLOGY" SOCIETY

Senator QUAYLE. You indicate that some of the students that come from stateside you actually have to help to get up to par with the students you have there?

Ms. HILL. Quite often. Again I am speaking for the mathematics department.

Senator QUAYLE. It is somewhat important in this computer age and high technology where mathematics skills are quite relevant.

Ms. HILL. We have a computer program, and we have extremely enthusiastic teachers of the compter program. In that particular program the waiting list is quite long. We provide it from the 7th grade on through the 12th so that the little guys have a chance to be in there, too.

In choosing the textbooks, and the textbook choice was made back in 1979 for math textbooks, we were quite anxious to choose the top textbooks, textbooks that really demanded the children to give their all.

Because I have been in this a long time, I recognize textbooks, and I find that quite often some of the stateside schools have what I call watered-down algebra textbooks and so forth. So, we have the best that we can get.

If you give the children that enthusiasm and if you present that material, they will go just as far as you can take them. That is all they need, just an enthusiastic attitude toward them and a positive attitude.

We also have programs for those who can't do the advanced work. So we are taking care of both things.

Senator QUAYLE. In other words, you would not necessarily agree with the previous testimony that the reason that the SAT scores may be higher is because of the input from the State-supported schools?

Ms. HILL. No; I would not agree with that.

Senator QUAYLE. Have you had any problem receiving paychecks?

Ms. HILL. No; I haven't had any problems. Mine is sent to my bank here in the States. I have never missed one.

Senator QUAYLE. Do you know any teachers that you work with who have a lot of problems getting paychecks?

Ms. HILL. Not where I am.

Senator QUAYLE. Thank you.

Mrs. Cook?

STATEMENT OF MYRA B. COOK, ADVISORY COMMITTEE MEMBER, FRANKFURT HIGH SCHOOL, FRANKFURT, GERMANY

Mrs. COOK. Mr. Chairman, if it is all right, I would like to read my testimony.

Senator QUAYLE. Fine.

Mrs. COOK. I am extremely honored to have been selected to come from Europe to appear before this committee. I would like to tell you something about my background and why I was chosen to testify.

I have been actively involved with DODDS, both as a teacher and parent, during three different tours to Germany with time frames of 1960, 1970, and 1980.

I have the highest regard for the classroom teachers, administrators, counselors, and consultants with whom I have worked in the 23 years of my association with DODDS.

I have children enrolled with DODDS in the elementary, junior, and senior high schools in Frankfurt, Germany, and a daughter in college who was a first grader in the DODDS system.

I am serving a second term on the Frankfurt High School Advisory Committee and am active in the PTSA of my children's schools.

I have a master's degree in education from Cornell University, have coauthored three methods books in elementary education, and have taught in schools both inside and outside of the DODDS system. I am telling you this to show that I am vitally interested in all aspects of education.

SCHOOLS ARE PARTNERS IN DOD MISSION RESPONSIBILITY

I know that quality schools are an essential part of a stable community. By its very name, DODDS shows itself to be an accepted partner in the military community. This is critical. With the schools under the jurisdiction of the Department of Defense, base or post commanders now have a mission responsibility to see that the needs of those schools are met, and they respond accordingly. This sense of mission responsibility cannot be stressed too highly. Based on my personal experience as teacher and parent from 1960 through today, I believe that DODDS has done an outstanding job of providing quality education for the military dependent.

This is not just my personal opinion, but a great body of statistical data exists through test results, accreditation studies, reports and interviews to substantiate the claims that DODDS students receive an outstanding education and are competitive academically with stateside schools at all levels.

DOD HAS 36-YEAR OPERATIONAL RESPONSIBILITY FOR SCHOOLS

The Department of Defense has a 36-year history of operational responsibility for the dependent schools. The Department of Education has no such track record for comparison, and I am concerned about the many unknowns that this represents. I can see no valid reason to trade the known for the unknown, particularly when the known has proven itself beyond question by meeting the highest standards of educational criteria.

Speaking, therefore, as parent and educator, I see no advantage in transferring the dependent school from the Department of Defense to the Department of Education. On behalf of the military family, I urge you to leave the dependents' schools under the jurisdiction of the Department of Defense.

Thank you again for the opportunity to testify before you on the vital issue which concerns all members of the military community, but which impacts particularly on the military family.

TRANSFER WOULD HAVE NEGATIVE IMPACT

Senator QUAYLE. Could you expand a little bit on the impact on the military family and what potentially it could do?

Mrs. COOK. I think that the basis of the statement that they recruit individuals but they retain families is the fact that good schools are a stabilizing element in the military community, which is a community of transition. This is of the utmost importance.

I can tell you that I have taught for DODDS. I was extremely happy, I extended to teach. I have had my children in schools. We have had return tours because we knew we were coming back to good schools, a fine school system.

We are extending an additional year. We have a 3-year tour. We have already made plans, the paper work has been submitted, to extend another year because we are very happy with the education our children are getting. I think without any question that a fine and stable school system has a tremendous impact on families, whether they will come overseas or whether they will not.

I cannot say enough fine things about the experience I have had personally, 10 years apart, with three different tours with DODDS.

PERSONAL EXPERIENCES WITH DOD SCHOOLS

Senator QUAYLE. Do you know of people who have had bad experience or terrible experiences?

Mrs. COOK. Stateside, overseas, anywhere you can always find individuals who have had bad times and are happy to tell you about them. But the overwhelming number of parents and teachers that I personally have been acquainted with in these three different tours have been extremely well satisfied.

Whatever complaints they have, whatever problems they have, they are met. My problems have been solved, and this has been my experience.

Senator QUAYLE. Do you find many of the teachers in the three different tours that have been relatively satisfied with DODDS schools?

Mrs. COOK. Yes, sir.

Senator QUAYLE. Why would all 6,000 of the OEA teachers want to have this transfer?

Mrs. COOK. I can't imagine that.

Senator QUAYLE. You don't share that statistic?

Mrs. COOK. I don't see that. Even though I was not under contract to teach the last two times that I have been to Germany, I have certainly been active in the schools as a parent aide, as a volunteer.

I am on the advisory committee. There are certain complaints. They wish supplies would come faster. There are hang-ups now and again on housing, but it is not something that can't be solved and that isn't solved.

Senator QUAYLE. Thank you.

Dr. Shurtleff.

STATEMENT OF DR. HEIDEMARIE SHURTLEFF, REPRESENTATIVE, OVERSEAS FEDERATION OF TEACHERS

Dr. SHURTLEFF. Mr. Chairman, I am Heidemarie Shurtleff representing the Overseas Federation of Teachers and the American Federation of Teachers.

The Overseas Federation of Teachers affiliated with the American Federation of Teachers, AFL-CIO, represents 1,500 teachers in the DODDS school system. On their behalf I would like to offer our appreciation to the subcommittee for holding hearings on an unresolved issue of great importance to the members of our union; that is, the proposed transfer of the DODDS school system from the Department of Defense to the Department of Education.

TEACHER ORGANIZATIONS OPPOSE TRANSFER

The OFT and AFT opposed transfer of the DODDS schools to Education when that Department was created. We raised many questions about the effects of the transfer on teachers and the schools. None of the questions we raised have been answered to the satisfaction of our members.

We are grateful to Senator Quayle for extending the deadline, but we feel a permanent solution is required. The uncertainty and confusion among DODDS teachers has become intolerable. Their status must be clarified once and for all.

STATUS OF FORCES AGREEMENTS

Conditions in the DODDS system, the quality of education for the children served, and the conditions of employment for the teachers employed were never major considerations in the transfer. Teachers in the overseas school system currently are under the status of forces agreement. They have the right to use the PX, APO, commissary, to register cars; they are not required to pay taxes to the host nation. All these benefits will be forfeited in the transfer of DODDS to the Department of Education.

A memorandum from the Joint Chiefs of Staff to the Secretary of Defense states that:

> Under the NATO SOFA the civilian component of the "force" is defined as "the civilian personnel accompanying a force of a contracting party who are in the employ of an Armed Service of that contracting party."

Of course if we are in the Department of Education, we are no longer with the armed services. We feel once this change has been made, host nations can accept it or they may find reason to try and establish new conditions for DODDS teachers.

Now you hear this morning from Dr. Smith that at one time England tried to impose a United Kingdom tax on the earnings of teachers in DODDS schools. These teachers were protected by the status of forces agreement, an agreement that covers employees of the Department of Defense.

Teachers in England will have to worry about paying dual taxes if they are no longer Department of Defense employees, but rather are employed by the Department of Education.

In Germany, reservists are not permitted to use the PX, the commissary, and the APO while they are in uniform performing their weekend duties. They may not use them because the status of forces agreement in Germany never mentioned reservists, and they have been reluctant to reopen the status of forces agreement to include reservists because this could result in negotiation of major sections of the treaty.

Nothing that has been produced by a department of the U.S. Government has guaranteed DODDS teachers that if they lose their benefits, they will be compensated for their loss.

ADDITIONAL CONCERNS REGARDING TRANSFER

Now there are philosophical and educational problems with the transfer as well as the very practical ones that we have heard in part this morning. The Department of Education would be running 1 of the 10 largest school systems. Should the Department operate these schools? We believe they should not.

Now what will happen is that the base authority will be less responsive to the logistical problems that we will have. We feel, yes, commitment by the military has been very strong. Once we are not part of the military establishment, there will be less of a commitment. There will be problems with logistics and maintenance.

We feel there will be an instability in the teaching force. I believe that, with SOFA, many teachers will terminate employment because it is far too expensive to live overseas without the protection we have with SOFA.

Yes, we have problems, but then not everything is perfect. Then which system is indeed perfect? I have been with this system for 14 years, and I continue to stay on with the system.

We would like to thank the committee for these hearings.

[The prepared statement of Dr. Heidemarie Shurtleff follows:]

Prepared Statement of Dr. Heidemarie Shurtleff, Teacher, Garmisch Elementary School, Representing the American Federation of Teachers, AFL–CIO and the Overseas Federation of Teachers

Mr. Chairman and Members of the Subcommittee: I am Heidemarie Shurtleff representing the Overseas Federation of Teachers and the American Federation of Teachers.

The Overseas Federation of Teachers affiliated with the American Federation of Teachers, AFL–CIO, represents 1,500 teachers in the DODDS school system. On their behalf I would like to offer you appreciation to this subcommittee for holding hearings on an unresolved issue of great importance to the members of our Union; that is, the proposed transfer of the DODDS school system from the Department of Defense to the Department of Education. The OFT and AFT opposed transfer of the DODDS schools to Education when that Department was created. We raised many questions about the effects of the transfer on teachers and the schools. None of the questions we raised have been answered to the satisfaction of our members. Accordingly, the AFT continues to oppose the transfer of DODDS to the Education Department and we support the concept in S. 1474 that the transfer should be permanently blocked. We know that the administration has also taken the position that the transfer should not occur but quite frankly we have seen no evidence that any action beyond lip service is contemplated. If the administration is serious about stopping the transfer they could do it in a number of ways including reorganization authority. But no such authority has been requested and nothing has been done to encourage other action to change the law still on the books that requires DODDS school system be transferred to the Education Department. We are grateful to the work done by Senator Quayle to extend the transfer deadline, but, a permanent solution is required. The uncertainty and confusion among DODDS teachers has become intolerable—their status must be clarified once and for all.

The Overseas Federation of Teachers and its parent organization, the American Federation of Teachers, strongly opposes the transfer of the DODDS school system to the Department of Education. We believe that an examination of the issues leads to only one conclusion. Transfer of the DODDS school system to the Department of Education was designed to make the Department of Education legislation more palatable to those who claimed the Department of Education would simplify the Federal education bureaucracy.

The conditions in the DODDS system, the quality of education for the children served, or the conditions of employment for the teachers employed were never major considerations in the transfer. In fact, several issues have arisen since the Department of Education Organization Act mandated the DODDS transfer which leads us to believe that the conditions of employment for teachers in the system would be irreparably damaged if the school system were transferred. This damage would occur because teacher coverage under the Status of Forces agreements negotiated between the United States and its Western European allies would be put into serious jeopardy.

Teachers in the Overseas School system are currently protected by Status of Forces agreements. They have the right to use the P.X., APO, commissary, and are exempt from registering as a resident alien and certain visa and work permit regulations. They are not required to pay taxes to the host nation, and they are able to obtain a vehicle registration and drivers' license through the American military. All of these benefits might be forfeited if the transfer of the DODDS to the Department of Education goes ahead as planned. We have evidence to support this contention that goes beyond the fact that the American Federation of Teachers did not support the transfer in the first place.

I now make reference to a memorandum dated April 16, 1980 from Joint Chiefs of Staff to the Secretary of Defense (JCSM 100-80), pp. 4-5, which reads as follows:

"3. *Status of Forces Agreements*

"a. *Discussion.*—Although Congress has directed that the U.S. Government continue to accord 'civilian component' status to overseas dependent schools' personnel following their transfer from the Department of Defense to the Department of Education, this congressional mandate is not binding on host nations, and these nations may take the view that the individuals in question are no longer eligible for such status under the applicable provisions of existing SOFAs. Under the NATO SOFA (Article I, subparagraph 1(b), the civilian component of the 'force' is defined as 'the civilian personnel accompanying a force of a Contracting Party who are in the employ of an armed service of the Contracting Party.' Accordingly, overseas dependent school personnel currently employed by the Department of Defense are, without question, 'in the employ of an armed service.' As such, they are eligible to be accorded all civilian component benefits and exemptions of the NATO SOFA, to include customs, tax, postal, automobile registration, and operators' license privileges and access to medical, dental, commissary, and post exchange facilities. Additionally, they are not required to register with host-nation authorities as resident aliens and are exempt from passport and visa regulations. Following the transfer of overseas dependent schools personnel from the Department of Defense to the Department of Education, the personnel in question will no longer be 'in the employ of an armed service' of the United States. They will, in fact, be employees of the U.S. Department of Education. Accordingly, host nations could, if they chose to do so, object to the U.S. designation of these individuals as members of the civilian component. In view of these facts, the two departments must formulate a transfer plan that will, to the fullest extent possible, maintain a legal nexus for the continued extension of civilian component status and the concomitant privileges and exemptions to overseas dependent schools' personnel.

"b. *Recommendation.*—(1) In order to enjoy the rights, privileges, and protections accorded members of the civilian component by SOFAs or any supplementary agreement thereto, overseas dependent schools' personnel should be considered DOD employees for administrative purposes. Accordingly, these personnel should be subject to the same degree of DOD control exercised by a Military Department over its civilian component members in connection with all matters arising from SOFAs or any agreement or arrangement supplementing the SOFAs. Likewise, the Department of Education should be ultimately responsible for the acts of these personnel to the same extent as the Military Departments are for the acts of members of the civilian component under the SOFAs and any implementing arrangements. This would constitute no change with respect to the current degree of Service control exercised over these personnel.

"(2) Passports, ID cards, orders, and other documentation of a similar nature provided overseas dependent schools' personnel should be issued by the U.S. Armed Service concerned and be identical in every respect to those of members of the civilian component. This would be in keeping with current practice.

"(3) U.S. Authorities should consider, on a country-by-country basis, the degree of clarification needed regarding the civilian component status of overseas dependent schools personnel under the SOFAs or implementing agreements.

"(4) In matters involving overseas dependent schools personnel arising within the context of SOFAs or supplementary agreements thereto, the U.S. Armed Service exercising Designated Commanding Officer functions within the country concerned should serve as the U.S. contact with host-nation authorities.

"(5) Department of Defense and Department of Education agreement to subparagraphs 3b(1), (2), (3), and (4) above and the measures taken to implement these recommendations should be fully documented in the Interagency Agreement effecting the transfer of DOD Dependents Schools (DODDS) to the Department of Education.

"(6) The transfer plan developed to implement the transfer in question should be coordinated with the legal staffs of all overseas commands.

4. Administrative and Logistic Support

"a. Discussion. Administrative and logistic support services will continue to be provided by the DOD components in overseas areas on a reimbursable basis, since the Department of Education has no means of providing similar support. New interdepartmental support agreements will be drafted. The experience of the overseas commands should be utilized in preparing appropriate support agreements between the Department of Defense and the Department of Education.

"b. Recommendation. Unified commands and Service components should be provided the opportunity and adequate leadtime to comment on all proposed logistic support agreements concerning support of overseas dependent schools."

Hearings have been held on the House side regarding the problems raised here. It is clear to us that no amount of paper shuffling in the U.S. Government can guarantee protection for our members. Once a change is made the host nations can accept it or they may find reason to try and establish new conditions for DODDS teachers. It is a roll of the dice as to how the status of the OFT teacher will change should the status of their employer change.

We know from the experience of our members overseas that domestic law of he United States has no binding authority on the actions of the host nation. We know that in England, for example, the Government of the United Kingdom has sought to tax, under U.K. law, the earnings of the teachers in the DODDS schools. They were protected by the Status of Forces Agreement, an agreement that covers employees of the Department of Defense. Teachers in England have a right to worry about paying dual taxes if they are no longer Department of Defense employees, but rather are employed by the Department of Education.

In Germany, reservists are not permitted to use the P.X., commissary, and APO while they are in uniform performing their weekend duties. They may not use them because the Status of Forces Agreements in Germany never mentioned reservists, and there has been a reluctance to re-open the Status of Forces Agreement to include reservists because this could result in renegotating major sections of the Treaty. Nothing that has been produced by a department of the United States Government has guaranteed DODDS teachers that if they lose their benefits, they would be compensated for their loss.

In 1979, in testimony before the House Committee on Government Operations, the American Federation of Teachers spelled out some very important reasons why the DODDS schools should not be transferred. There are philosophical and educational problems with the transfer, as well as the very practical ones that we have just examined. The Department of Education would be running one of the ten largest school systems in our Nation. Should this Department operate schools? We believe it should not. Will transfer to Ed have the effect of disenfranchising the parents whose children are served by DODDS with redress for grievances even more remote than present? Will the base authorities be less responsive to the schools logistical needs if they are not part of the military establishment? All of these questions lead us to one conclusion: There is no good reason to transfer the schools and many thorny questions that argue against transfer, the weight of the evidence is clear—the schools should not be transfered.

In conclusion, we would like to thank the committee for launching these hearings. One set of hearings is only a beginning and the problems facing the DODDS school system are myriad, but we sincerely thank you for your concern and trust that we can work together toward a satisfactory solution.

DEPENDENTS SCHOOLS PERSONNEL OPPOSE TRANSFER

Senator QUAYLE. You talk about the potential loss of benefits to teachers and indicate that perhaps some of them may terminate their employment. Obviously this is a question that all teachers would have. I would think this is quite a concern.

Is there among teachers that you have discussed this with some uncertainty?

Dr. **Shurtleff.** Definitely. We have discussed it, and many teachers are very concerned. I think my teacher colleagues would be equally concerned if we were not under SOFA.

Mr. **Foley.** I would like to comment on that.

Senator **Quayle.** Go ahead, Mr. Foley.

Mr. **Foley.** When I learned I was coming to testify at this hearing I sent a letter out to all of the teachers in our complex which includes three schools and invited them to make comments whether or not they thought we ought to stay with the Department of Defense or transfer to the Department of Education.

I received either through written notes back or verablly probably around 40 comments. Not one person was in favor of the transfer to the Department of Education.

Senator **Quayle.** Were these all OEA teachers?

Mr. **Foley.** They were given to every teacher.

Senator **Quayle.** This would be some OFT teachers, too? I am trying to find out if there is some difference between OEA teachers and AFT teachers. I am trying to get the teacher impact.

We basically have been told all 6,000 of the OEA teachers are in favor of the transfer. If that is the case, that is a salient point. If that is not the case, what I am trying to get is whether this is just a fight among a couple labor unions or is it a difference of one teacher.

I know teachers a little. I had an aunt who was a teacher for 52 years. They have comradery. They speak a common language. Their goals are the same.

Dr. **Shurtleff.** I am a member of the OFT as well as OEA teachers. I know many OEA teachers who are also concerned about losing SOFA. So I don't think we can say as a blanket estimate all teachers are going one way or another way.

CRITERIA USED TO JUSTIFY TRANSFER DECISION

Senator **Quayle.** I would hope I can get AFT and OEA out of it and talk about teachers and talk about quality of education because that is part of my interest, no matter what particular organizations you are a member of.

It may be relevant in contract negotiations and things like that, but when we come down and look at whether to transfer or not we ought to sort that out and try not only to accommodate the teachers but the children and quality education.

What you are saying to me is that there is a great concern among teachers about what would happen if this were to take place. Sure, there are problems, there are problems in everything, problems with life. Let us face it. We have problems in Congress. We have problems downtown. We have problems in my school district in Huntington, Ind.

The burden is really on the proponents of the shift to show why they should shift. I am sort of detecting from what you are saying that you are relatively satisfied. We will be creating more uncertainties and potential loss of benefits if there is a transfer.

Like the old adage says, if it's not broken, let's not fix it.

What you are saying is that it is a good system. Maybe each one of you might want to comment on the teacher concerns from the teaching aspect.

Mr. FOLEY. I can only assume from the response that I have that the teachers want to stay with the Department of Defense.

The other area I guess would be that the problems will not be solved more easily by moving from one department to another. They can be solved within the Department perhaps better than by moving to a different agency.

Mrs. COOK. That is the comment I would like to make. I am not a practicing teacher at this moment, but certainly the teachers I have talked to and the parents and families that I work with, believe the problems, if they can be solved at all, can be solved better through the Department of Defense than through the Department of Education.

Senator QUAYLE. Ms. Hill, do you have any comments?

Ms. HILL. I would add that I feel that none of the teachers would want to change if they felt their privileges would be taken away.

Teaching in the Pacific area, particularly in Korea, without the SOFA agreement would not be very pleasant. I am certain that the teachers would' not want to go there under such circumstances.

Again I say we have a good system, an excellent system.

TEACHER RECRUITMENT WITHIN DOD SCHOOLS

I heard a comment made about the recruiting. The DODDS system is working on that. That is one thing that I like to think about DODDS, they are constantly working on things, teachers and administrators and parents give some input, they are constantly trying to improve that.

I went over the work they are doing in recruiting this year and changes they are trying to make to get positive people. They are doing that. It is such a good system I would hate for it to have to go through the pain of transfer and have the things happen that I feel would happen.

Senator QUAYLE. Do any of you have any final comments?

I certainly appreciate your making the effort to come over and testify.

Dr. SHURTLEFF. I would like to make one final comment.

Without the SOFA there would be not a stable teaching force. There would be no career teachers who would stay for a very long time in any of the areas. I think that is why we have had such a good system because we have had people who stayed on, not every year new teachers coming in, the backpackers making it for a year and then moving back to the United States.

Senator QUAYLE. Basically you can pretty well say as a summation of the teachers' point of view, irrespective of whichever labor union you are a member of, that if in fact the SOFA agreement could not be extended to include the Department of Education employees, that you would be fairly well convinced that almost all teachers, I mean the teachers, not the leadership back here, teachers over there, would be opposed to it?

Is that a fair statement?

Let the record show that all four agree it is a fair statement.

Without objection, the record will remain open for a reasonable period to include a representative sampling of correspondence from interested parties in this issue.

[The correspondence received follows:]

AFCENT AMERICAN SCHOOL,
APO, New York, December 14, 1982.

Senator DAN QUAYLE,
U.S. Senate, Washington, D.C.

DEAR SENATOR QUAYLE, I am presently teaching with the Department of Defense Dependents Schools system in Europe and I should like to indicate my support for your determination to keep the DODDS teachers within the Department of Defense.

I share your concern that transfer to the Department of Education would have an adverse effect upon both the employment rights of teachers and the quality of education provided to dependent children.

Please note my support for your viewpoint. Thank you for your demonstrated concern for dependent education.

Sincerely,

KARLEN K. SHEPPARD.

DEPARTMENT OF DEFENSE,
DEPENDENTS SCHOOLS, ATLANTIC REGION,
January 14, 1983.

Senator DAN QUAYLE,
Senate Office Building,
Washington, D.C.

DEAR SENATOR: I would like to express my appreciation for your efforts in putting forth a bill to keep the Overseas Schools under the Department of Defense.

I have read statements by Mr. Jack Rollins in which he claims to represent the views of the overseas teachers on this issue. As an OEA member for 18 years and a Life member of the NEA I can assure you he does not represent our views on this particular issue. I recently wrote to Mr. Rollins and challenged him to ballot all OEA members on this—his reply was noncommittal.

As a teacher and guidance counselor in the overseas system for 22 years I have had more respect and support from the military than I ever had from any Stateside school board or community. As a veteran of the Korean Conflict I appreciate the military family's problems and feel we need to maintain an open line of communication—which being with the Department of Defense enables us to do. I feel the Department of Defense has done a fantastic job with the overseas educational system and believe the products of that system is ample proof.

Please keep up your good work. Again, thank you very much for your efforts on our behalf. The military need us and we need them.

Sincerely,

CLIFFORD E. THOMPSON,
Croughton High School.

APO, NEW YORK, *January 16, 1983.*

Hon. Senator DAN QUAYLE,
Senate Office Building,
Washington, D.C.

DEAR SENATOR QUAYLE: As a teacher in the overseas program I would like to protest any move to transfer DODDS to the Department of Education. I firmly believe it should remain with the Department of Defense. Jack Rollins, president of OEA, does NOT represent my feelings, no matter what he says.

Sincerely yours,

JOANNE L. STUDENT.

Wesley L. Bond,
APO, New York, January 24, 1983.

Senator **Dan Quayle**,
*Senate Office Building,
Washington, D.C.*

Dear Senator Quayle: I am writing to you in reference to the transfer of Department of Defense Dependents Schools (DODDS) from DOD to the Department of Education (DOE) in May of 1984.

As a guidance counselor in DODDS, I am opposed to DODDS transferring to DOE. As a member of the Overseas Education Association (OEA), teachers and guidance counselors never had a voice on the issue of being transferred to DOE, not even a vote! Consequently, Jackie Rollins, OEA President, "voice" on the transfer to DOE does not represent the feelings of teachers and guidance counselors at large!

I am enclosing a photo copy of an article from the September 11, 1977 issue of the "Stars and Stripes." The article will illustrate the "hawkish" attitude of Britain to tax teachers when or if we are transferred to DOE. It almost happened in 1977–78, please don't let it happen in 1984!

Sincerely yours,

Wesley L. Bond,
Guidance Counselor, Alconbury High School.

RAF Upper Heyford,
APO, New York, January 24, 1983.

Senator **Dan Quayle**,
*Senate Office Building,
Washington, D.C.*

Senator Dan Quayle: I am writing in support of your bill, S. 1474. Having taught in DODDS for 17 years (10 as a teacher representative), it is impossible for me to imagine any benefit in transferring the present system to the Department of Education.

Quite apart from the horrifying disadvantages to DODDS personnel that could follow from such a transfer, such as loss of PX and commissary privileges and exemption from foreign income tax, the bureaucratic and logistical disarray that would result are almost too overwhelming to contemplate.

Furthermore, there appears no compensating benefits to those whom we are paid to serve—the children of service personnel overseas.

Nearly all educators with whom I have discussed this matter are agreed that transfer to the Department of Education would be most foolish.

Yours sincerely,

Dr. **Melville Frishberg**.

January 24, 1983.

Senator **Dan Quayle**,
Senate Office Building, Washington, D.C.

Dear Sir: As a teacher in the Brussels American School in the Department of Defense Dependent School System I wish to express my concern at the prospect of our schools being transferred to the Department of Education.

Jackie Rollins, OEA President, does not speak for all OEA members, nor have we even been asked.

The teachers at the Brussels American School feel it would be a tragic mistake to make this change. Our concerns are: Who will provide payroll, communications, APO privileges, logistics, SOFA entitlements, tax free concessions, banking privileges, and all of the other essential services now provided by local military commanders?

I believe there would be a mass exodus of teachers if this change is made. The expense of this change at a time when money needs to be conserved would be foolish.

Please do not allow the DOD schools to be moved to the Department of Education.

Sincerely,

Carol J. McCullough,
Brussels American School.

STUTTGART AMERICAN HIGH SCHOOL,
PATTONVILLE,
APO, New York, January 31, 1983.

Senator DAN QUAYLE,
Senate Office Building, Washington, D.C.

DEAR SENATOR QUAYLE: I am writing to urge your assistance in halting the proposed transfer of the overseas military dependent school system from the Department of Defense to the Department of Education. I strongly feel that this is not in the best interests of all concerned, especially the student clients of these schools.

Some of the reasons that I feel it will result in handicapped educational program for dependent children overseas are as follows:

1. We will not receive the mandatory support from the military systems in which we live and operate.
2. The Education Department is not set up logistically to give us the full support that we need.
3. We will become involved in bureaucratic and departmental in-fighting between the two departments.
4. The local military communities will gradually lose their influence on policies and conditions affecting local school conditions.
5. Teachers will not be guaranteed the status protections of DOD civilians under the Status of Forces Agreements.

Because of the above and other potential problems, I firmly feel and believe that the educational program and student, community, and teacher morale will significantly suffer.

Sincerely,

CHARLES L. WAGNER.

February 17, 1983.

Hon. DAN QUAYLE,
Senate Office Building,
Washington, D.C.

DEAR SENATOR QUAYLE: I know you are concerned with where the administration of the Dependents School should lie. In reading arguments about the transfer from the Department of Defense to the Department of Education, I have noticed that those who argue against the move continuously point out how such a move might effect the teacher. What about the students? Might it not create a system under which they would benefit far better than now. As long as the Department of Education does not become a puppet of the NEA it might foster educational changes more motivating to the students than what we now experience. If the change could wipe out the ineffectiveness of so many school administrations, that in itself would justify the move. Having followed the remarks of Dr. Bell, I conclude that he is far superior to educational needs than those running the Dependent Schools under the Department of Defense.

Yours truly,

COURTLANDT C. KAUFFMAN.

February 22, 1983.

Senator DAN QUAYLE,
Senate Office Building,
Washington, D.C.

DEAR SENATOR QUAYLE: This declaration of support for your bill, S. 1474, contains 119 signatures of DODDS employees located mainly in the five school complex at the U.S.A.F. Base, Upper Heyford, England (Near Oxford).

Many are members and officers of the Overseas Education Association—NEA whose leadership is committed to transferring DODDS into the Department of Education. It is apparent that OEA-NEA leaders have lost touch with their members overseas and are not truly representing their collective opinion.

I trust that this manifestation of support will, in some measure, be of help to you.

Sincerely,

DR. ROBERT W. MCGURRIN.

JANUARY 21, 1983.

Senator DAN QUAYLE,
Senate Office Building,
Washington, D.C.

DEAR SENATOR QUAYLE: We the undersigned teachers, assigned to the Department of Defense Dependents Schools located at RAF (USAF) Upper Heyford, Oxfordshire, England, would like to express our wholehearted support for your bill S. 1474 which will enable DODDS to remain with Department of Defense.

1. Dick D. Poe
2. Robert W. McGurrin
3. Tamara Frishberg
4. Joan Pirkle
5. Dorothy L. Elliot
6. Susan Mathewson
7. Elizabeth Hathaway
8. Betty J. Bristol
9. Chris Watts
10. Greg J. Klaes
11. Ann Recesso
12. Jane H. Frances
13. Patricia A. Patton
14. Judith Schukei
15. Mancy McGurrin
16. Kathleen Riley
17. Sharon Epperson
18. Sonia M. Selwood
19. Jean Grant
20. Carla M. Galloway
21. Katherine Steuer
22. Diane L. Damisch
23. Karen E. Lyding
24. Mary Ann McCready
25. Denise Marcus
26. Shirlee McGreer
27. Sally Wagner
28. Marilyn Armstrong
29. Peggy Wright
30. Betty Bucklin
31. Cheryl Cecil
32. Rhonda Killabrew
33. (Illegible)
34. Richard Cecil
35. Claudette DeWitt
36. Thomas McCready
37. Mel Frishberg
38. Fred Rice
39. Muriel Barnes
40. Betty Jalley
41. Catherine Yanisch
42. Iona Lane-Burslem
43. Kay Jones
44. Ivan J. Kessler
45. Joyce Smith
46. Genora P. Gant
47. Charles E. Sims
48. Eugenia P. Booras
49. Stephen R. Bucklin III
50. Beatrice Chandler
51. Norma Ebert
52. Erma Neel
53. Robert J. Calzini
54. Marilyn Jensen
55. Judy L. Dotson
56. Wayne Greenlaw
57. Joyce Byington
58. Sylvia Clawson
59. Ruth S. Kirtland
60. Anne Lansberry
61. Carolyn Mikula
62. Richard E. Gaffery
63. Mary Deats
64. Michael Halpin
65. Dorothy Malcolm
66. Kenneth E. LaCasse
67. Elizabeth A. Weeks
68. Charles Recesso
69. Elizabeth J. Heater
70. Mary Mendel
71. Carl M. Gross
72. Elaine Schmidt
73. Jane Haward
74. Lucia M. Tyler
75. Valerie Woodward
76. Fred J. Carpenter
77. Paul Steinbeck
78. Clifford E. Thompson
79. Thomas L. Sanders
80. Ralph B. Williamson
81. Arthur Sharr
82. William Ebert
83. Grederick A. Brisky
84. Harold Blan Palmer
85. Leonard Gehring
86. John Simons
87. Will Davidson
88. Jack W. Looper
89. Peggy Mohr
90. Ellen W. Smith
91. Tony Piazza
92. Genevieve Hagopian
93. E. Dale Poe
94. Ray Smith
95. Del Frances
96. David Gardi
97. Dee Looper
98. Louise Watts
99. Gwynneth Hearne
100. Robert Brzezinski
101. George B. Hummer
102. Rita Dorris
103. Bruce Ballard
104. Ann Degner
105. (Illegible)
106. Thomas Klever
107. Carol Johnson
108. Teri Johnson
109. Eve LaTulip
110. Adele Kaneda
111. Janice Riley
112. Sharah Rice

113. Robert A. Mohr
114. Sandra J. Michols
115. Barbara M. Pracht
116. Polly DeYoung
117. Anne M. Sykes
118. Emme Espinoza
119. John Felt

Questions Submitted by Senator Dan Quayle

ACCREDITED SCHOOLS

Senator Quayle. Dr. Jones, is there a requirement that all elementary, junior and senior high schools in the United States be accredited? (If not, in your opinion should they be accredited?) Is this true for overseas schools?

Dr. Jones. There is no requirement by the Federal or State Governments that all elementary, junior high, and senior high schools in the United States be accredited. Most U.S. secondary schools are members of their regional accrediting agencies (e.g., the New England, North Central, and Middle States Associations of Colleges and Schools).

Yes, all schools should be encouraged to undertake the quality analysis offered by their respective regional accrediting associations in order to improve the effectiveness of the education offered to their students. Any requirement to do so, however, should emanate from the State rather than the Federal level.

Like other U.S. schools, all DOD schools should be fully accredited by the appropriate association: in the case of DODDS, they have opted to affiliate with the North Central Association of Colleges and Schools (NCA). A very high percentage of the DOD schools are accredited with no deficiencies cited in NCA visit reports, while others—also accredited—have had some deficiencies cited that are being corrected. DODDS is making continuing efforts in cooperation with NCA to upgrade the quality of all its schools.

RATIONALE FOR TRANSFERRING DODDS EDUCATION

Senator Quayle. Dr. Jones, in your opinion what was the rationale for the transfer of DODDS to Education and can you see any benefit to our military dependent students by having your Department administer this program?

Dr. Jones. The rationale for the transfer of DODDS to Education as explained by the previous Administration was the following:

That the primary purpose and goals of the DOD schools were more in line with the central mission of the Department of Education than with the central mission of the Department of Defense.

That the expertise and research findings in education would be more readily accessible in the Department of Education than in the Department of Defense.

That the schools would be less isolated from the rest of American education in regard to current trends, so that the transition of its students to schools in the United States would be easier.

That the schools might be able to participate in a wide range of programs not now open to them.

I can see no benefit to our military dependents by having ED administer the schools, because:

The schools are now providing quality education to these students, as evidenced by the fact that average DODDS SAT scores exceed the national average. There is no reason to change a system that is currently effective.

The Department of Defense clearly recognizes the importance of the DOD schools to retention of military personnel.

All the expertise, research findings, knowledge of trends, and Federal programs are as available to military dependents with the system located in the Department of Defense as they would be with it located in the Department of Education. DODDS staff are in as close contact with all U.S. education associations, other Federal education staff, and other U.S. school systems as they would be if they were paid by the Department of Education.

FEDERAL EDUCATION UNDER ONE AGENCY

Senator Quayle. Dr. Jones, do you believe that all Federal education activities and functions should be centered in one agency?

Dr. JONES. The question as to whether all Federal education activities and functions should be centered in one agency is very broad. In its application to the overseas dependents schools, I believe that transfer of the schools to the central Federal education agency would gain nothing that cannot be achieved by continued efforts to improve the system through coordination and collaboration with private and public associations and agencies. In fact, any sharing by two Departments of the administration and operation responsibilities would almost certainly tend to decrease the effectiveness of the schools by adding one more administrative layer, and thus lower the quality of education now offered.

Senator QUAYLE. Mrs. Shurtleff, on page 1 of your testimony you state, "We raised many questions about the effects of the transfer on teachers and the schools. None of the questions we raised have been answered to the satisfaction of our members."

Could you please identify for the committee some of the questions you raised?

If through legislation we insured that teacher benefits and status would not change, would you support transferring the policy making function for this program to the Department of Education?

[The information requested was not received in time for printing.]

GENERAL ACCOUNTING OFFICE STUDY

Senator QUAYLE. Dr. Korb, the General Accounting Office has completed a study on the managerial effectiveness and organizational efficiency of the DODDS system. The GAO found a number of weakeness in these areas and recommended that management control be strengthened.

In your opinion, have these deficiencies had an adverse effect on the quality of education?

What steps are being taken to correct these problems?

Dr. KORB. I do not feel that the deficiencies adversely affect the quality of education. The recommendations in the GAO report addressed the need to develop a uniform accounting system and initiate cost control procedures designed to ensure maximum control over program resources.

DODDS has brought on board additional personnel to evaluate operations and to design an accounting and fiscal management system. General system requirements have been developed in conformance with General Accounting standards. Completion of the total accounting system and implementation are scheduled for October 1, 1986. In the interim, as segments of the system are developed, they will be implemented.

DEPENDENTS EDUCATION WITHIN DOD

Senator QUAYLE. Dr. Korb, the proponents of the transfer of DODDS to the Department of Education have stated repeatedly that education is not the primary mission of DOD and also that the Education Department could provide greaer expertise and assistance to the overseas schools.

Dr. Korb, would you comment on this assertion by the advocates of the transfer?

Dr. KORB. The mission of the Department of Defense clearly extends to providing for the welfare and morale of military personnel assigned to overseas areas. The education of dependent children is an important part of this mission, and it has been performed successfully by professional educators for over 35 years. In the past, the expertise in the Department of Education has been available to the Department of Defense Dependents Schools, and it is anticipated that it will be in the future.

Senator QUAYLE. Mr. Foley, why would a transfer of the DODDS program to the Department of Education diminish parental interest and involvement in the education of their children?

If teacher benefits remained the same and the Department of Defense continued to provide logistical support, would you support the transfer of policymaking to DOE? If not, why not?

[The information requested was not received in time for printing.]

EDUCATIONAL OFFERINGS AND DODDS BUDGET

Senator QUAYLE. Dr. Kolb, are the educational offerings in dependent schools similar to those found in typical stateside schools? Is this true for vocational education as well?

What is the DODDS budget for fiscal year 1983?

Dr. KORB. DODDS educational offerings meet or exceed those of typical stateside schools of the same size relative to number of programs, currency of materials, and quality of instruction. This is also true for vocational education. During the coming school year, DODDS will improve the vocational education program by adding pre-technical programs and by upgrading curriculum, equipment, and teacher training.

The approved fiscal year 1983 President's Budget includes $418.5 million for the operation of the Department of Defense Dependents Schools for fiscal year 1983.

Senator QUAYLE. Mrs. Cook, based upon your expertise and experiences in education, what areas of this educational program need to be improved?

Mrs. COOK. I feel that the educational program in the dependent schools is sound. I have been extremely well pleased with the education my children have received at the elementary, junior high and senior high levels—not only over the past four years, but in 1968–1970 as well.

From what I have observed and from listening to principals and teachers despair over having the problem solved, I feel that there is an area that desperately needs improvement and that is the matter of supplies. It is an attempt to solve this problem that, I believe, has caused many teachers to speak out for a transfer to the Department of Education. I feel this is such a critical area that I would like to elaborate:

Money does not appear to be the issue since adequate funding for supplies is provided each year. The problem lies within the government system of requisitioning and unless DODDS is granted some exception because of its uniqueness, the problems may never be solved.

I believe the problem can best be explained by two examples: one relating to the Art curriculum and one relating to the English curriculum.

Art: Using Frankfurt High School as an example, the Art Department is given $5,000 to order expendable supplies each year. They receive an average of $2,000–$3,000 worth of supplies in return for their money; the remaining 40–50 percent of the funds are lost to the high school.

How does this happen? The teachers research various vendors and order specific items from a specific vendor for their program. These orders are placed on SF 36 addressed to the particular vendor and ideally, they would go from the high school to DODDS-Germany Logistics to DGSA for contracting with the specific vendor. What actually happens when it goes to DGSA is that the order is split up and grouped according to various items such as brushes, paper, clay, etc. These group orders are given to the lowest bidder and the teacher's order is therefore, split. It is common for a normal order to be 50 percent *unfilled* for three years. The order a teacher placed for his/her specific curriculum is never received as a total and the educational program must always be adjusted to what is on hand which is in fact, the bits and pieces of many orders. This not only impacts negatively on the curriculum but *its biggest negative impact is on teacher morale.*

English: Also using Frankfurt High School as an example, the problems begin at DGSA when orders are received for paperback books which are the backbone on the elective English programs. Even though teachers have requested specific vendors, the titles are broken out and given to various vendors. Again, it is common to receive only 50–75% of one's order so that the funds are again lost, teacher morale is damaged, and when substitute titles are sent, the curriculum must be changed.

This same problem is felt by the librarians with regard to the library book orders. Again, titles are spread out to vendors and the high school receives 50% different titles or no books at all from the original orders mailed in. And again, the prevailing attitude among the teachers and librarians is "what's the use"?

Even though it is recognized that government orders are handled routinely in this fashion, our system has many exceptions to policy due to the way it is organized and written up under the law. Perhaps a few exceptions to policy could be made in this area of logistics which would result in a tremendous improvement for the teachers and the schools.

Senator QUAYLE. Is there any role that the Department of Education can fulfill in the DODDS educational system?

Mrs. COOK. I cannot think of any significant benefit for DODDS by a transfer to the Department of Education. One might assume that cabinet level emphasis could not help but improve the quality of education. Studies indicate, however, that DODDS employees would comprise two-thirds of the population in the Department of Education, yet the dependents schools budget would be only a small portion of the DOE total budget and there would be no significant benefits in terms of funding and improvements.

The arguments between the OEA and DODDS in the transfer seem more management vs. employee for the sake of argument rather than a real issue where changes would benefit the dependent schools system. In fact, instead of benefits, it appears that there would be additional bureaucratic problems to contend with.

I am attaching a copy of an article from the 17 May 83 *Stars and Stripes* indicating the European PTSA's strong support for remaining with the Department of Defense and its disapproval of the transfer to the Department of Education.

[From the Stars and Stripes, May 17, 1983]

PTSA Convention Comes Out Against Transfer of DODDS

(By Charlie Bowden)

BERCHTESGADEN, GERMANY.—The European Parents, Teachers and Students Association last week threw its support behind a move to block the proposed transfer of the Department of Defense Dependents Schools to the Department of Education.

The move was among 10 resolutions adopted Thursday at the 25th annual convention of the European Congress of American Parents, Teachers and Students (ECAPTS).

Dr. Beth Stephens, DODDS director, addressed the group May 10 and said that DODDS is opposed to the transfer. She told the delegates representing 41 schools in three European school regions that such a move would only "add one more bureaucratic layer to the paperwork required to run the school system."

The transfer was scheduled to take effect May 1, but was postponed until May 1, 1984. The Department of Education is also opposed to the transfer of responsibility.

The 26,000-member organization also adopted a resolution asking DODDS to alter its curriculum requirements to include at least one year of host-nation language and a semester of host-nation culture and history for junior and senior high school students. Principals could grant exceptions to this policy, according to the PTSA resolution.

One proposed resolution, which was tabled after lively debate, concerned religious programs in the overseas school system. The resolution asked that DODDS adopt a policy and a set of rules governing the observance of religious beliefs, customs and holidays.

However, it was pointed out that DODDS, at least in the Germany Region, has a policy, which was issued May 12, 1982. The policy prohibits DODDS employees from advocating or supporting any particular religion.

The regulation states that, "to maintain neutrality, schools will avoid exposing students to any form of indoctrination in any particular religious belief. Therefore, official prayer, posting materials, displaying symbols, using film or tapes, verbal instruction and any other form of communication which promotes any religion are not sanctioned during the school day on the premises and at school-sponsored functions."

Chuck Jennings, who was re-elected unopposed to a second term as president, said the organization will begin a letters campaign to key congressional leaders promoting the PTSA's position. Jennings is an elementary school teacher at Rhein-Main AB, Germany.

Other officers elected at the convention were: Lt. Col. D. C. Gilley, Wuerzburg, 1st vice president; Angela Pfeifer, a student at Kaiserslautern high school, 2nd vice president; Phyllis Avella, Wildflecken, Germany, secretary; and Sallee Johnson, Frankfurt, treasurer.

Regional vice presidents elected were: Gail Hanson, Alconbury, England, Atlantic Region; Kathy Peters, Spangdahlem, Germany, Germany Region; and Elizabeth Filosa, Naples, Mediterranean Region.

The PTSA honored Lorraine Bates, a kindergarten teacher-aide at Bitburg AB, as educator of the year. Pat Coleman, new president of the Naples elementary school PTSA, was chosen parent-volunteer of the year. The Giessen PTSA was named the honor unit of the year.

Senator QUAYLE. I understand that a great many spouses of military personnel serve as teachers in DODDS. Is that correct? Does this cause a rapid turnover of teachers because of change of station orders of military personnel?

Mrs. COOK. Yes, a great many, but not an overwhelming number, of military wives serve as teachers in DODDS. At Frankfurt Elementary No. 1, on a teaching staff of 66, there are presently 15 dependent hires. A survey prepared for me by the principal indicates that over the past three years in that school, there were no significant differences in resignations or PCS moves between Stateside Hires and Dependent Hires:

	DEP hire PCS	Conus hire transfer/ resignation
School year:		
1982–83	10	5
1981–82	5	4
1980–81	7	7

One distinct advantage of Dependent Hire is "bringing in new blood": new ideas, new viewpoints, a fresh new look at living overseas.

Having highly qualified, enthusiastic individuals in the system for even one year is a plus for the system. I believe the problems lie not in having Dependent Hires but rather with the procedures for hiring them. There are many problems connected with processing through the local CPOs.

If teachers are hired for *complete* years, there should be no disruption to the educational system. Turnover of teachers, whatever the number, should not pose a problem unless it occurs during the school year and this possibility can usually be determined by the sponsor's DEROS before the spouse is hired.

In conclusion, I see no benefit to be gained by a transfer of the dependent schools to the Department of Education. No matter what educators hoped for, a close examination of the facts indicate that the dependent schools will fare better under the Department of Defense. The Department of Education is not designed to operate school systems and has stated repeatedly that it has no desire to do so.

Senator QUAYLE. Thank you very much.

[Whereupon, at 11:35 a.m., the subcommittee adjourned, subject to call by the Chair.]

APPENDIX 1

REPORT TO CONGRESS: OEA-DODDS LABOR-MANAGEMENT RELATIONS IN THE OVERSEAS SCHOOL SYSTEM, BY JACK ROLLINS, PRESIDENT, OVERSEAS EDUCATION ASSOCIATION

INTRODUCTION

The intent of this report is to provide interested parties with information pertaining to Labor-Management Relations between the Overseas Education Association and the Department of Defense Dependents Schools.

Although the report is not complete and is general in nature, it covers a broad spectrum of issues that continue to be the main source of irritation in employee relations.

The Department of Defense Dependents Schools (DODDS) came into existence on July 1, 1979 as required by P.L. 95-561, titled "Education Amendments of 1978" Act which was passed by Congress and signed into law effective November 1, 1978.

Prior to the passage of legislation, the overseas schools system existed on a temporary basis, reinstituted each year through budget appropriations, solely at the whim of the Department of Defense and its military components.

Initially (1946), schools were set up on military installations, where needed, staffed and funded by each respective military command having jurisdiction over the site where the schools were located. Due to the discrepancies involved in priorities, no two schools were alike in cudrriculum programs, staffing, and logistical support. This practice existed until 1963 when the DOD consolidated the operations of schools under regional commands with the Department of Army assuming jurisdiction over schools in the European region, the Department of Navy over the Atlantic region, and the Department of Air Force over the Pacific region.

The consolidation was an attempt to unify administrative responsibilities and give credence to an educational system that needed accreditation recognition. Despite that attempt, problems of uniformity remained between the regions; therefore, further consolidation took place in 1976 when all the military schools were placed under the Office of Dependents Schools directly under the Department of Defense, separated from the military commands with a central administration which is located in Washington, D.C. P.L. 95-561 brings us to the present, with no changes being made in administration but a significant change being made in budgeting. For the first time, the DODDS budget was recognized as appropriations separate from the DOD or military budgets.

Throughout this period of development, 1946 - present, the problems with curriculum, staff needs, and logistical support continued. Today they still continue to be of concern to Congress, the Department of Defense, and DODDS employees when related to "Quality Education" in the Overseas Schools System.

There is no question in my mind that each respective concerned group promotes quality education for American school children overseas. The basic differences between the groups lie in the methods of achievement, the time necessary for achievement, and the cost.

Although teachers recognize the problems associated with time and money, their main focus centers around methods of achievement. Basic assumptions of teachers are: if the system provides us with enough qualified staff, equipped with the proper materials, supported by qualified administrators (educationally oriented) and military personnel (educationally minded), and the morale is good, then quality education will be a natural outcome of events.

From the beginning of the Overseas Schools System, teachers have struggled to hone their concepts of what a school system should do to improve and maintain quality education: Quality education that comes from having well-trained personnel working in an environment conducive to learning; an environment that promotes cooperation among the educational partners (students, parents, teachers, administrators, and the military commands); and a cooperative atmosphere that promotes morale.

The education of our youth is a vital responsibility of society. Quality education develops our concepts of a good society. From time to time you will find individuals, from each of the groups mentioned, taking up the banner of quality education in the overseas program. Movements spring up for the purpose of growth and progress in the school system, but the movements are short-lived because of the lack of communication and cooperation between the various educational partners.

When one evaluates the growth of the Overseas Schools System from 1946 to the present, it is obvious that thirty-two years were devoted to simply maintaining an existence and three years to an attempted revolution by Congress (1978) involving recognition of the need for a permanent Overseas Schools System organized under the proper Executive branch of government, one that would concern itself primarily with education -- the Department of Education (proposed for 1982).

For evaluation purposes, one must identify the efforts made by the DOD and its components, DODDS, and the military commands in promoting teachers morale.

STAFFING

Historically, staffing in the Overseas Schools Program was based on appropriations limitations. DODDS would make a budget request, and, based upon the amount of annual appropriations granted by the DOD, staffing was figured out. A change has been made in recent years whereby DODDS now staffs (for teachers) on enrollment by allocating one teacher slot for each 27 students in the system. Using the overall allotments, DODDS then tries to staff each school based on requirements accepted by the North Central Accreditation Agency that accredits the schools for college entrance standards.

Statistics will show that many schools end up being understaffed with classroom teachers and possibly overstaffed with others.

You can draw your own conclusions based on the following data (excluding Panama).

	ABOVE SCHOOL LEVEL	P.L. 86-91 CLASSROOM TEACHERS	TOTAL P.L. 86-91	SCHOOL LEVEL GS	SCHOOL LEVEL LN
Atlantic	57	532.5	701.0(20)	112	120
Germany North	63	1797	2252.0(37)	342.5	338.5
Germany South	72	1315	1686.0(31)	259	285
Mediterranean	57	554	756.5(20)	140	169
Pacific	55	876.5	1176.5 (1)	219.5	221.5
DODDS	97				
	401	5075.0	6572 (109)	1073.0	1134.0

Total P.L. 86-91 (Classroom teachers, Counselors, Librarians, Nurses, all Specialists) - 109 Administrative Slots = 6463

Total GS (Administrators, Adm. Assistants, Secretarial/ Clerical Personnel at School Level and above) = 1474

Total LN (Local Nationals - Direct Hired and Indirect Hired) = 1134

Total Supervisory (DODDS-GS, region-GS, 109) = 1583

Total Administrative (GS, LN, 109) = 2717

Total Support (GS, LN, 109, and non-classroom P.L. 86-91) = 4214

Ratio: 6463 ÷ 1583 (Supervisory) Administrative = 4.08 P.L. 86-91 to 1 Staff.

6463 ÷ 2717 (GS, LN, 109) = 2.38 P.L. 86-91 to 1 Staff plus LN.

5075 ÷ 1583 (Supervisory) = 3.21 Classroom Teachers to 1 Staff.

5075 ÷ 2717 (Administrative)= 1.87 Classroom Teachers to 1 Staff + LN.

5075 ÷ 4214 (Support) = 1.20 Classroom Teachers to 1 Support Personnel

Due to DODDS' not budgeting for P.L. 94-142 requirements (Handicap Act) and other Title XIV required slots (P.L.95-454), regular teaching slots were reduced to allow DODDS to meet the new requirements. Teachers are also receiving additional duties without compensation to take care of requirements established under these programs.

Due to the staffing methods used by DODDS, teachers suffer from overcrowded classrooms.

Local Hires.

Until recent years, DODDS has faced annual recruitment problems in trying to get teachers to work and live overseas. Stateside positions were more abundant than qualified teachers and living conditions overseas were harsh. As incentives, Stateside teachers were offered mobility (transfer guarantees out of certain hardship areas after 1 year), differential compensation for working in hardship areas, cost-of-living allowances to offset adjustments in living costs overseas versus Stateside, living quarters allowances (LQA) or free housing to compensate for selling their property Stateside and providing them with housing overseas equitable with living conditions in the United States. These incentive benefits were provided to all teachers regardless of where recruited, Stateside or overseas.

During the 1970's three important changes came about. The number of school age children in the United States declined, resulting in lower enrollment in schools which, in turn, resulted in a surplus number of teachers available for teaching overseas. The second important change was the decline of American economic influence worldwide accompanied by the increase in the standard of living in other countries, especially the ones where the DODDS schools are located. This brought about a tremendous upsurge of living costs related to DODDS staffing overseas. A third important change was the all-volunteer U.S.

Forces (following the Vietnam conflict) accompanied by a decline in the number of personnel going into the military, especially those going overseas.

Faced with the problem of getting military personnel to serve overseas and to serve for long tours due to fewer numbers, the military command needed incentives. Realizing that a great number of officers and enlisted personnel had spouses who were qualified teachers, a campaign was adopted promoting overseas tours by guaranteeing spouses' employment. Pressure was put on Congress to support recruitment of teachers overseas (military and DOD Civilian dependents). DODDS bought the idea because it helped to offset the other problems related to the increase in personnel costs due to the decline in the value of the dollar overseas. Local hires (NTEs) represented cheap labor because housing and travel need not be paid to dependents. Both DODDS and the military achieved something from this program.

With this program actively in force, regulations were soon changed to prohibit the paying of benefits to teachers recruited overseas. This included tourist hires (at one time a valuable supply of personnel) who were stripped of every benefit, even more than the dependents. DODDS could now afford to practice this new policy because of the surplus number of teachers available Stateside for recruitment without incentives.

From this point forward, Congress has been confronted with several legislative proposals (presented by teacher groups) to provide teachers recruited overseas some equity in benefits compared to teachers recruited Stateside and other federal employees. A present legislative proposal, H.R. 4393, attempts to provide some equity in benefits to DODDS teachers hired overseas, while at the same time recognizing the need for hiring employees on a temporary basis without certain benefits. The question of equity comes after the initial year of employment and the same teacher is retained for more than one year of employment.

Substitutes.

This is a major problem area because of the limited number of available substitutes to meet the needs of teachers when taking leave. The problem comes about because of the paradox created by DODDS' requiring that substitutes meet the same qualification standards as regular teachers but at the same time having a priority 1 recruitment practice of hiring local personnel, which practice results in depleting the number of substitutes. With the limitation on substitutes, teacher leave requests are denied, thus placing an undue restriction on teachers' abilities to participate in training programs, host nation activities, Association activities, community activities, and personal problem resolutions.

To further complicate matters, DODDS has a practice of refusing to use substitutes for counselors, librarians, specialists, nurses, host-nation teachers, etc., which creates undue hardship on these personnel when they areabsent and results in negative feelings towards the absentee party by those employees, students, and community personnel impacted by the absence.

Paraprofessionals/Teacher Aides.

DODDS uses both phrases "Paraprofessionals" and "Education Aides" to denote personnel who act as assistants to teachers. In the Atlantic, Germany North and Pacific regions they are called ParaProfessionals. In the Germany South and Mediterranean regions they are called Education Aides.

Presently there are approximately 505 teacher assistants worldwide (excluding Panama) which ratios out at 1 assistant for every 10.05 teachers (5075 classroom teachers ÷ 505 assistants). Since most assistants are at the Kindergarten/Elementary level, the ratio then would be 1 assistant for every 5.8 teachers (2932 K - 6 teachers ÷ 505 assistants).

The intent to use aides to assist teachers with classroom activities may be positive in nature, but when aides are being used to replace regular classroom teachers in order to save money, the issue becomes serious. Teachers appreciate assistants, but they would rather have 2 teachers, teaching 20 students each, than having 1 teacher and 1 assistant in a classroom with 40 students.

In addition to being called "cheap labor," aides are often referred to as "lackeys." Each aide is hired on a temporary basis and given a GS rating which places them in a position that removes them from the bargaining unit (this is Management's position, not OEA's). They are given no employee rights, such as grievance processing, transfer opportunities, promotion opportunities, transportation and allowances. They are strictly a "tool" (lackey) of Management--another tool to go along with the other tools - NTE's, local nationalists, secretaries, clerks, and supply personnel.

The OEA claims the rights of these assistants as professionals. Management denies the rights on the grounds that they are not P.L. 86-91 personnel (a change made by Management after once giving them P.L. 86-91 status) and not professionals -- just another example of Management's concern for employee rights.

EXCEPTED SERVICE - CLASS I, II

When it comes to identifying classifications of teachers for job-related purposes such as promotions, RIF's, and reassignments, DODDS has created a regular circus. All teachers are classified as Excepted Service employees - Class I, as distinguished from General Service employees - GS. Within the excepted service field, DODDS further classifies teachers as Excepted Appointment - Substitute, Excepted Appointment - Intermittent (temporary hire on a short-time basis, usually tourist hires), Excepted Appointment - NTE (temporary hire usually for a semester or a school year), Excepted Appointment - Probationary (1st year regular hire), Excepted Appointment - Conditional (regular hire during first three years of employment), Excepted Appointment - Indefinite (employees converted from NTE status), Excepted Appointment - Career (regular employees who have served more than three yeras).

With this many classifications, no wonder things get complicated. Each classification has its particular entitlements, each different in some ways from the others.

To cite a few discrepancies between the different groups, one needs to look at transportation, overseas allowances, and housing benefits.

RECEIVES BENEFITS

	SUBS	TOURIST HIRE NTE	DEPENDENTS HIRE NTE	CONVERTED FROM NTE	PROBA-TIONARY HIRE	CONDITIONAL AND CAREER HIRE	JROTC
Travel Agreement	NO	NO	NO	NO	YES	YES	NO
Overseas Allowances (Post Differential, COLA, Post Allowance)	NO	NO	NO	NO	YES	YES	YES
Renewal Travel	NO	NO	NO	NO	YES, IF 1-YR. AREA	YES	NO
Housing (LQA)	NO	NO	NO	YES	YES	YES	NO
Salary	Flat $48.50	REG	REG	REG	REG	REG	MIXED-MILITARY, DODDS
Life Ins., Medical Ins.	NO	NO	NO	YES	YES	YES	YES

TRANSFERS

Throughout the history of the Overseas Schools System, transfers have always been a major morale factor among teachers. When teachers came into the program they were told, for incentive purposes, that they would have the opportunity to move from country to country annually (or every two years). What they soon found out, and more so in recent years, is that opportunity meant, as one Regional Director said, that, "Teachers should be thankful for having the opportunity to apply for a transfer." The key word is application, not participation.

Due to the fact that the Overseas Schools System has had more teachers in the past, it is easy to understand why teachers say, "Why is it so hard to transfer these days; we could move almost at will in the past." The fact is, we have fewer teachers today than before, while percentage-wise, we have more transfers.

HOUSING

Teaching for DODDS entails living in foreign countries, and while Management can be excused for poor housing conditions in the past -- especially at the end of World War II -- what excuse is there after thirty-five years?

Initially, teachers were classified as GS-7 (Warrant Officer or Second Lt.) and forced to live primarily in government quarters on military installations. OEA fought for, and achieved, a higher ranking for teachers for housing purposes (GS-11 or Captain).

The struggle never ends because of DODDS' negotiated ISSA's (Inter-Service Support Agreements) with the military calling for different arrangements (never the same) worldwide, which arrangements force us to abide by the whims of local commanders when it comes to types of housing and the options of living on- or off-base.

To note some discrepancies:

1. Teachers are not considered for housing equal to military or other civilians of equal rank;

2. Married teachers, primarily, but in some instances, single teachers, are not allowed to live on the military installation;

3. In some areas, teachers are forced to live on the military installation;

4. Teacher spouses of military personnel are denied housing allowances;

5. Rank of the military spouses is used to determine eligibility for on-base housing even when the rank is lower than the teacher's rank;

6. Teachers are forced out of military housing after five years overseas and not given the opportunity to reapply regardless of how many years they intend to remain in the area; and

7. Adequate housing allowances are not available to meet the demands of local economies.

All in all, it boils down to one simple fact -- teachers are considered to be fourth-class citizens when it comes to housing rights. The ranking order seems to be: (1) Military, (2) DOD Civilians, (3) DOD Contract Civilians, and (4) Teachers.

SALARY

In the beginning (1946), overseas teachers were hired on a GS (General Service) standard and given a rating of GS-7. This was maintained by each military command with no change in rating until the OEA convinced Congress to pass P.L. 86-91 (1959) which set up a salary schedule based on the average salary of school systems in the United States but not to exceed the Washington, D.C. school system. With this Act came a reclassification of teaching positions removing teachers from the GS standard and placing them on the Excepted Service Standard as Class-I.

OEA sought further modifications in salary by getting Congress to amend P.L. 86-91 with P.L. 89-391 (1966) which placed salaries on an equitable basis with U.S. urban school systems with populations of 100,000 or more. This amendment required the DOD to pay teachers on current salaries, but DOD chose to base salary rates on the previous year rates determined from data provided by the NEA. OEA sought just compensation by bringing a class action suit (March case) against the DOD in 1966. Litigation procedures took ten years, but teachers prevailed, with the courts ordering the DOD to issue back pay. Unfortunately, the courts were limited to a maximum of a seven-year period for back pay, along with a $10,000 maximum. Thus, teachers still lost thousands of dollars.

DOD had the power to award total damages to the teachers but chose to remain with their position of giving teachers the minimum possible. Some teachers still have not received settlements. DODDS chose to retaliate for the court action by raising the school year from 187 work days to 190 work days, with no additional pay. OEA countered with a demand for negotiations that resulted in a 1978 Agreement calling for extra pay for the additional days beyond the average number of days worked in school systems upon which the salaries were based (186 average vs. 190 DODDS). This Agreement also included an extra pay lane, BA+15.

Despite reaching a teacher-ratified agreement with OEA, DODDS chose not to honor the Agreement simply by refusing to implement it. OEA was forced to counter with a national level Association grievance which is still pending before an arbitrator today. In addition, the OEA has brought suit in Federal Court over the extra days (Johnson - 190-day back pay suit). This suit is pending before the U.S. Court of Appeals.

For the last two years, salary adjustments have been an item for national level consultations between the OEA and the DOD with both years ending in the DOD's refusal to accept the OEA requests for additional pay lanes and pay steps as allowed under the law. The OEA has filed national level Association grievances for both years with the first year now pending before Arbitration.

In summary, the historical development of salary under the Department of Defense delineates DOD's refusal to give teachers the benefits entitled them by law and to grant them the maximum benefits allowed within their jurisdictions. We receive, apparently, only what blood and tears bring from litigation proceedings.

1. The Administration was asked if they would support legislation to give GS personnel higher salaries? Answer - yes.

2. The Administration was asked if they would support legislation changing P.L. 86-91, as amended, to give teachers a different pay system. They asked, in return, if it would cost them more money. When they found out the additonal costs, their answer was - no.

3. The Administration was asked if they would support legislation putting teachers back on the GS salary? Answer - no, if it would increase their budget.

Question - How does number 3 relate to number 1?

MEDICAL AND DENTAL BENEFITS

Due to the fact that their jobs are located in overseas areas, teachers, along with all other Americans, are faced with the extreme hardships involved in receiving medical attention suitable to their needs.

In most areas, the U.S. Military is required to provide service but lacks the necessary medical facilities. Even in areas where the U.S. Military does provide services, teachers are placed on a "space available" basis that comes only after the regular military personnel; their dependents, retired military and dependents, and other civilian employees are served. The only personnel who may come lower on the service ladder than teachers would be local nationals or emergency cases involving American civilians outside the DOD service.

In some areas, especially at U.S. Navy facilities, some services are denied entirely (such as dental care--unless an extreme emergency is indicated). When services are provided, civilians are forced to pay a fee that exceeds the normal costs of services in the United States.

In summary, this is a benefit area in which teachers are left to fend for themselves with help only from the OEA. DODDS has the power and ability to provide these services free of charge, but chooses not to.

EMERGENCY EVACUATION

There are three conditions under which teachers are reached for emergency evacuation purposes: One would be when a political crisis exists that would require evacuation of American citizens. The second would be when a teacher is sent home due to sickness or death of relatives. The third would be when teachers are evacuated to another location for medical purposes.

In the first instance, there are no regulations governing the rights of teacher benefits during the evacuation period. In the second and third, there are no requirements to provide teachers with required travel orders, thereby causing extreme financial hardships to employees and the loss of services due to unnecessary time delays in transportation.

Teachers are forced to travel, without proper orders, on a military med/evac aircraft when evacuated to and from their duty station due to illness. Primary hardships develop on return travel when teachers may travel only on a space-available basis on the same type of military aircraft or commercial aircraft (at cost to the employee).

Due to delays resulting from travel restrictions, teachers often lose valuable "teacher leave" time or lose money when placed in a LWOP status.

Practically all DOD employees, except teachers, travel freely and in a low-cost posture when taking leave because they control the transportation system in issuing orders, determining mode of travel, and determining dates of travel.

TEACHER TRAINING

The DODDS system is very weak when it comes to training teachers to meet new requirements imposed on them arbitrarily.

Although the Pacific region now offers 50% tuition assistance (thanks to OEA-Pacific) for teachers attending college and university courses, it may be the only region that offers any assistance. They still, however, impose extreme restrictions on what courses can be taken and have not increased the budget for assistance.

Recently, DODDS announced a sabbatical leave program (without meeting their negotiations requirements with OEA) that provides for twelve slots to go to employees (Atlantic - 2, Mediterranean - 1, Pacific - 2, Germany North - 4, and Germany South - 3). When one computes this, based on a ratio of 12 to 12,000 employees, it equates to one leave per 1,000 persons which equals .1%. On top of this, it is to be emphasized that the program is for all employees, not just teachers. One may say that it is best to have _a_ program rather than _none_, even if the slots do go only to administrators.

Each year DODDS has a habit of changing its qualification standards, which results in the requirement that teachers must receive additional training at their own expense.

PROMOTIONS

This concept is only mentioned to express the fact that there is no promotion system set up for teachers. The only system that does exist is within Management ranks and, in actuality, is a joke because there are no real procedural requirements for DODDS to follow in promoting anyone. The selection process is strictly controlled by top Management. So, in order to get promoted, one must rely on the good wishes of the selectors.

TOUR OF DUTY

This is a concept that involves the workday, the length of the school year, and the length of duty required at the overseas site.

Teachers are constantly being harassed over what constitutes their workday. If it were left up to DODDS, each teacher would work a minimum of eight hours each day plus attend faculty meetings and other meetings beyond the workday.

Teachers are presently being harassed over the length of the school year. OEA has been forced into court over the length of the school year which has been changed from approximately 186 days to 190 days without extra pay. Most recently, teachers are being told that they may lose renewal agreement travel rights if they do not serve a minimum of 175 days per school year.

At one time, there were school sites in such hardship areas as Midway Island so that DODDS thought it beneficial to guarantee those teachers transportation away from the site each time they were in a leave status (Christmas/New Years/spring and summer breaks). Now the only way teachers can get away from sites, just as difficult as Midway Island, is to travel at their own expense commercially or space-available--when it is available (which is seldom). Although there are a few sites presently listed as one-year tour-of-duty sites, there need to be more. There are many hardship areas in the DODDS schools system even in countries such as West Germany, England, Spain, Italy, the Philippines, and Japan where DODDS lists them as two-year areas strictly to reduce budget costs — another example of teachers taking the brunt of cost-saving techniques.

CERTIFICATION/RECERTIFICATION

This was a joke from the start. When the certification/recertification program was implemented by DODDS because of a mandate from Congress, it had its problems right from the start.

The OEA negotiated with DODDS on the proposed regulation. After reaching an agreement on the wording in the regulation, the OEA agreed to implementation with the understanding that impact proposals were still on the table for negotiations. Immediately thereafter DODDS suspended negotiations and implemented a different regulation than the one agreed to.

Since implementation, several problems have developed because of DODDS' clear intent not to abide by the understanding.

1. DODDS has failed to classify anyone as being grandfathered on their certificates.

2. DODDS claims grandfathering only applies to teachers who remain in the same position in the same school forever.

3. Processing of teachers' records is constantly being abused. Transferred teachers show no records. Certificates do not reflect what teachers and Principals agreed to. Some teachers have not received certificates. Records of renewal units are not being maintained properly in the schools. Credits for renewal units are not being applied uniformly.

4. Teachers are not being credited with stateside certificate credits.

5. NTE's (not to exceed-temporary hired) are not receiving certificates even though the regulation requires it.

6. DODDS tries to use recency of experience requirements towards credits.

7. Certificates are not being upgraded to show new areas of certification when achieved by teachers.

8. DODDS still has failed to organize the Recertification Appeals Committees to hear teacher complaints.

9. Certificates can be easily forged.

10. DODDS constantly changes position coding which results in outdating certificates annually.

GRIEVANCE PROCESSING

DODDS' attitude seems to be centered around refusing all grievances with the intent of forcing arbitration issues on OEA, knowing the enormous cost factor. There is very little attempt to resolve issues at lower levels and no informal process or resolution at regional and national levels.

TEACHER LEAVE

In 1959, Congress passed the Defense Department Overseas Teachers Pay and Personnel Practices Act, P.L. 86-91. With the Act, DODDS teachers were changed from the Federal employment category General Service (GS) to the category Excepted Service (Class I).

As GS employees, teachers were entitled to 13 days of annual leave with unlimited accumulation and _____ days of sick leave with unlimited accumulation. When they were changed to excepted service employees, their two leave programs were combined into one program called "Teacher Leave." Assuming that teachers will not remain with the system for a long period of time because the system is temporary in nature, and using the argument that sick leave need not be accumulative in nature, but taking into consideration that annual leave which is accumulative was being merged with sick leave, Congress placed a limitation of 75 days on accumulation of Teacher Leave.

Time has passed and experience now shows a need for reconsideration. Teachers are remaining with the program for a long period of time, even to retirement, and due to the lack of being able to accumulate leave beyond 75 days, there is no incentive to save the days or not use the days. Without giving justification for the action, the record shows an increase in absenteeism for personnel who have accumulated beyond the 75 days.

The system needs the incentive program. In addition, all federal employees deserve to be treated as equal as possible with regard to benefits. Teachers are the only exception to the normal leave policy under federal employment. All other federal employees have unlimited accumulation of leave.

ADJUDICATION PROCESS

(Arbitration, Federal Court, Merit Board-MSPB, FLRA)

Basically, the only time OEA had any success in getting DODDS to fulfill its obligations to its employees was by suing the Department in court, having arbitration, or MSPB and FLRA cases. Even this process has problems because DODDS has even refused to do what the arbitrator, the MSPB, and the FLRA have demanded of them. Thousands of dollars in awards have not been paid by DODDS, and, in some cases, even after a two-year period.

DELIBERATIONS

When the present OEA-DODDS Agreement was negotiated in the summer of 1977, both parties recognized the concept of sub-unit bargaining. Due to the enormous cost factor involved and the lack of negotiating experience of OEA local leaders, the OEA agreed to the principle of deliberations as a substitute.

It was intended that all negotiable issues left unsettled at the lower levels would be elevated to higher levels for resolution. It was also intended that all proposed DODDS policies would be held in abeyance pending resolution at a higher level unless implementation was necessary due to time restraints and a need on Management's part. Also, the Agreement specifies the intended period of only two years for this practice because of a reorganization process going on within DODDS.

All these factors have ceased to be an issue. A new law now requires negotiations on all policies that affect employees. Despite this, DODDS has constantly refused to recognize OEA's right to bargain. They even go so far as to say that the deliberations process is used only to give input to Management for consideration with no requirement to negotiate. Some Management personnel even say that some issues are "non-deliberable."

All in all, it is the clear intent of DODDS not to cooperate with the Association in the bargaining arena.

NEGOTIATIONS

To further complicate the bargaining situation, DODDS has taken the position that they will only bargain with OEA when it costs no money and when OEA's proposals are readily acceptable. They do this by refusing to pay for travel and per diem for negotiators, as well as salaries in the recess periods.

So far they have been quite successful in using the tools of the bureaucracy to complicate and delay the negotiations process. They use the tactic of refusing to bargain in the first place on some Management-proposed policies and forcing OEA into an ULP posture which takes time to resolve. Once resolved in OEA's favor, Management then refuses to pay anything, forcing the issues to the Impasse Panel for resolution while more time is lost. Once this is cleared and the OEA finally gets to the table for negotiations, Management uses stalling tactics to delay even more. Then, as a final position before agreement, Management is forced back to the Impasse Panel to settle disagreements.

SUMMARY

It is not the intent of this report to provide a complete and comprehensive analysis of Labor-Management Relations to the Overseas Schools System, but rather to provide enough information to stimulate an interest in what is happening to the point of wanting something done about it.

In general, Labor-Management relations in the Overseas Schools System is at the beginning. Experience indicates to me that Management is programmed to make Association activities difficult, difficult to the point of frustration, and frustration to the point of withdrawal. Management has taken the posture of being uncompromising and uncooperative.

It will take a concerted effort on the part of all employees to overcome Management's position. We must remain united in our efforts. At the moment, Management feels dissension in our ranks; therefore, they play on our apathy, complacency, ignorance, divisiveness, and weakness to retain their position and their attitude of "benevolent dictatorship." If one truly believes in a democracy, one cannot accept the bureaucratic practices of DODDS and DOD.

The road ahead has many forks, and each one represents alternatives. One fork represents complete compliance with Management practices; another, absolute resistance to Management, using every legal avenue available. A third fork represents compromise but with employee rights determination. There are other forks, but the third probably is the best road to follow although it will be difficult, especially with Management's present attitude. Along with the third fork runs a parallel road that addresses our desired choice of Management: The Department of Defense versus the Department of Education. After reviewing the contents of this document as it relates to employee conditions under the Department of Defense, one must seriously consider new Management. The choice is up to each individual employee. I, as an individual, choose the Department of Education because of the potential growth with an educationally-motivated Management, realizing that if forces-to-be prevent the transfer of DODDS schools into the new department, we will remain with what we have now--DODDS/DOD.

[Federal Register, vol. 47, No. 216, Nov. 8, 1982]

PRESIDENTIAL DOCUMENTS

TITLE 3—EXECUTIVE ORDER 12391 OF NOVEMBER 4, 1982

The President: Partial Suspension of Federal Service Labor-Management Relations

By the authority vested in me as President by the Constitution and statutes of the United States of America, including Section 7103(b)(2) of Title 5 and Section 301 of Title 3 of the United States Code, and having determined that it is necessary in the interest of national security to suspend certain labor-management relations provisions with respect to overseas activities of the Department of Defense, it is hereby ordered as follows:

SECTION 1. *Suspensions.* With regard to United States citizen employees of the Department of Defense, including the Military Departments, who are employed outside the United States as defined in 5 U.S.C. 7103(a)(18), with the exception of those employed in the Republic of Panama:

(a) The provisions of 5 U.S.C. 7105(a)(2)(D), (E), (G), and (H) and of 5 U.S.C. 7123(b) are suspended with respect to any matter which substantially impairs the implementation by the United States Forces of any treaty or agreement, including any minutes or understandings thereto, between the United States and the Government of the host nation;

(b) The provisions of 5 U.S.C. 7102(2), 7114(a)(1), 7114(a)(4), 7116(a)(5), and 7117(c) are suspended with respect to any matter proposed for bargaining which would substantially impair the implementation by the United States Forces of any treaty or agreement, including any minutes or understandings thereto, between the United States and the Government of the host nation;

(c) The provisions of 5 U.S.C. 7116(a)(7) and 7117(b) are suspended with regard to any regulation governing the implementation by the United States Forces of any treaty or agreement, including any minutes or understandings thereto, between the United States and the Government of the host nations; and

(d) The provisions of 5 U.S.C. 7121(b)(3)(C) are suspended with respect to any grievance involving the implementation by the United States Forces of any treaty or agreement, including any minutes or understandings thereto, between the United States and the Government of the host nation.

SEC. 2. *Disputes.* Disputes between a labor organization and the United States Forces as to whether a particular matter is covered by one or more of the suspensions set forth in this Order shall be referred to the Secretary of Defense. The decision of the Secretary in such disputes shall be made after consultation with the Secretary of State and shall be final. The Secretary of Defense may delegate this authority, but only to the Deputy Secretary of Defense, an Under Secretary of Defense, or an Assistant Secretary of Defense. The functions assigned to the Secretary of State may not be delegated or assigned to anyone below the rank of an Assistant Secretary of State.

RONALD REAGAN.

THE WHITE HOUSE,
November 4, 1982.

REPORT TO THE CONGRESS

A Plan for the Transfer
# of the
Overseas Schools for Military Dependents
to the Department of Education
from the Department of Defense

Submitted in Accordance with Section 302
Public Law 96-88
(The Department of Education Organization Act)

U.S. Department of Education

May 4, 1981

PREFACE

On September 27, 1979, the Congress enacted the Department of Education Organization Act (Public Law 96-88), which provides for the transfer of the overseas dependents schools from the Department of Defense to the Department of Education within 3 years of the effective date of the act (May 4, 1980), and the submission of a plan for effecting the transfer within 1 year of the effective date. This transfer plan is submitted in compliance with the latter requirement.

Basic Data

In school year 1980-81, the DoDDS school system consisted of 10,904 staff, 270 schools located in 20 countries, and 135,624 students. In FY 1981, the total estimated cost of operating the schools, including construction and procurement activities, was $414 million. The number of schools by country and region is given below:

	Schools
Atlantic	39
Antigua	1
Belgium	4
Bermuda	2
Cuba	1
Great Britain (including Scotland)	23
Iceland	2
Netherlands	4
Norway	1
Newfoundland	1
Germany North	76
Germany South	63

	Schools
Mediterranean	36
Bahrain	1
Greece (including Crete)	2
Italy (including Sardinia and Sicily)	18
Portugal (Azores)	2
Spain	8
Turkey	5
Pacific	40
Japan (including Okinawa)	23
Korea	7
Philippines	10
Panama	16

Purpose of the Plan

Public Law 96-88, section 302(c) requires that the transfer plan include "a plan for effecting the transfer of functions under this section and administering those functions," as well as "recommendations for increasing the participation of parents, teachers, students, school administrators, and members of the Armed Forces in the administration and operation of the schools transferred." In response to these requirements, this transfer plan includes (1) arrangements for transfer, (2) a description of the various functions of the schools followed by an analysis and a list of requirements for effectively administering them, and (3) an initial chapter concerned with recommendations for increasing participation of the members of the overseas community.

Organization of the Plan

The plan is divided into seven chapters. The first chapter deals with increasing the participation of the overseas school community, the next five chapters cover the major functions of the overseas schools, and the last concerns the issue of the future status of the Panama Canal College. The subject and content of the chapters may be summarized as follows:

- Chapter I presents a description of the advisory structure of the overseas dependents schools, including a brief history of the schools from 1945 to the present, a comparative analysis of school administration in the United States, and a discussion of various strategies for increasing local community participation in the overseas schools.
- Chapter II describes the basic curriculum and educational services provided in the overseas schools and identifies opportunities for improvements, including increased support from the resources of the Department of Education. Particular emphasis is placed on those programs singled out in Public Law 95-561, section 1402(b)(2) as "designed to meet the special needs of the handicapped, individuals in need of compensatory education, individuals with an interest in vocational education, gifted and talented individuals, and individuals of limited English-speaking ability."
- Chapter III describes requirements for maintaining an effective work force to administer the overseas schools and interdepartmental arrangements for effecting the transfer of personnel and maintaining the existing status, rights, and benefits of personnel stationed overseas following the transfer.
- Chapter IV describes the financial management of the overseas schools, the financial support services required to operate them, and the interdepartmental arrangements for maintaining them.
- Chapter V describes the logistical support services required to operate the overseas schools and the interdepartmental arrangements for maintaining these services.
- Chapter VI describes the major organizational and management systems employed to administer the schools.
- Chapter VII discusses the alternatives for administering the Panama Canal College.

Each chapter contains recommendations derived from analysis of its subject matter. A few of these recommendations appear in slightly different form in several chapters, testifying to their importance to effective operation of the system as a whole. An executive summary is also included.

Methodology

In designing the transfer plan, the Department of Education consulted extensively with the Office of the Secretary of Defense, the Departments of the Army, the Navy, and the Air Force; military commanders located overseas, representatives of parents of children enrolled in the schools, professional employee organizations, school administrators, and students. Participants representing these organizations were invited to attend a 3-day conference in late spring 1980 to develop a framework for the transfer plan and discuss specific requirements and concerns to be addressed. An outline of the proposed plan was also circulated to all participants for comment, and most were involved directly in one or more of the 20 interdepartmental task forces established in fall 1980 to complete the planning phase.

Department of Education staff members visited each of the six administrative regions to obtain first-hand information on the operational requirements and characteristics of the overseas schools and to discuss arrangements for the transfer with parents, teacher, students, school administrators, and local military commanders. Reports on the overseas schools prepared by the Department of Defense, the North Central Association of Colleges and Schools, the General Accounting Office, and others were reviewed, and several sample surveys were conducted to obtain more detailed information on inservice training and services for students with special needs. The Departments of Education and Defense also worked closely together in developing budget estimates for the overseas schools.

Acknowledgments

The development of this transfer plan was dependent on the advice and support of many individuals and organizations. Particular recognition should be given to the contributions of Mr. Robert Stone and Mr. Douglas Farbrother of the Office of the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics; Mr. Kenneth Mulcahy, Mr. Donald Shycoff, and Mr. Roger Scanland of the Office of the Assistant Secretary of Defense (Comptroller); Colonel George Bailey, Dr. Richard Coss, and Mr. Charlie Walker of the Department of the Army; Colonel Philip Frederick, Jr., and Mr. Ray Reistad of the Department of the Air Force; Dr. Ann O'Keefe and Dr. David Smith of the Department of the Navy; Major William Masciangelo of the Marine Corps; and Lieutenant Commanders Barbara McGann and Jean Kohlmeyer of the Joint Chiefs of Staff.

We are particularly indebted to the outstanding support and contributions of Dr. Anthony Cardinale, Director of the Department of Defense Dependents Schools, and his fine staff in Washington and overseas.

A number of other organizations were extremely helpful throughout the transfer planning process. We are particularly grateful to Mr. Jackie Rollins, President of the Overseas Education Association, and the OEA members and staff; Mr. Ernest Lehmann, President of the Overseas Federation of Teachers, and the OFT members and staff; Mrs. Betty Annis, President of the Panama Federation of Teachers; Mr. Thomas Cavanaugh, President of the Overseas Association of Dependents Schools Administrators; Mr. James Halley, President of the European Congress of American Parents, Teachers & Students; and the many individual parents, teachers, students, and school administrators who gave so generously of their time and ideas during the past months.

Abbreviations

The following common abbreviations, given here with the proper nouns for which they stand, will occur frequently throughout the transfer plan, often without further explanation:

DOD ------------ Department of Defense

DoDDS ---------- Department of Defense Dependents Schools

ED ------------- Department of Education

FY ------------- Fiscal Year

ODS ------------ Office of Dependents Schools--the central headquarters of DoDDS

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CHAPTER I

TOWARD INCREASING SCHOOL COMMUNITY PARTICIPATION

DESCRIPTION

BACKGROUND

In the early 1800's, General Winfield Scott first recognized the need for educating children of military personnel and issued regulations for military schools, including an article on education for dependents. In 1821 the Congress enacted legislation based on these regulations and authorized funding through a special tax levied on merchants permitted to sell goods to the troops. The post schools operated under these regulations almost until the end of the 19th century. By this time, however, only about 10 percent of the total number of children at military posts were enrolled in post schools, the remainder being educated in State-supported public schools or private schools. By 1922, the Congress no longer appropriated money to support post schools, and they became dependent on recreation funds and local post contributions. In 1925, the Judge Advocate General of the Army ruled that despite lack of direct congressional appropriations for post schools, their existence was "not forbidden by law."

The Period from 1945 to 1970[1]

After World War II, international commitments requiring U.S. troops to remain abroad necessitated some provision for the schooling of their dependents. In May 1946, the Office of Dependents School Service (DSS) was established in the European Theater to plan and supervise a school program for minor dependents in the U.S. Zone of Occupation in Germany. The lines of command were military, from the area commander in chief through a headquarters staff officer to the DSS, which had a professional staff of three military personnel and four civilians. Appropriations for Army dependents schools had been refused by the War Department, and so initial funding came from the profits of the U.S. officers' and noncommissioned officers' clubs in the European theater, from tuition fees, and from a contribution of $100,000 from the Educational Fund of the U.S. Forces in Austria.

Although the Navy had secured congressional authorization to use appropriated funds to support its dependents schools in 1946 (Public Law 79-604), general authorization for operating schools for dependents was not given until passage of the 1948 Supplemental Appropriations Act, Government and Relief in Occupied Areas. The act included regulations for operating the schools and gave direct responsibility to the Chiefs of the Far Eastern and European commands.

During the post-war period, unsuccessful efforts were made to secure congressional authorization for a permanent, centralized school program in which all dependents schools, although administered separately, would have similar policies and programs. In 1952, the United States European Command was formed from the individual service organizations in the European area, with the function of coordinating their administrative and logistical activities. Also, North Central Association accreditation teams visited the European command to inspect the secondary schools and strongly recommended a higher degree of coordination among the services in such matters as teacher recruiting, special consultative services, professional conferences, and replacement of the military by civilian professional educators with full responsibility for educational aspects of the program. These were some of the factors that led the services to agree upon a policy of assigning each service specific geographical areas in which it was responsible for operating schools for dependents of all the services, generally coinciding with the geographical areas in which the respective service operated most of the schools. Each service established an office to help administer its own dependents schools operations and prepare its annual budget submission to the Congress. Although there were differences between services, the line of command usually went up from the civilian school principal through the civilian superintendent for that geographical area or theater, then to the deputy personnel officer of the military service in command of the area, and finally to the commander in chief of the area. Nevertheless, much of the day-to-day responsibility was delegated to the civilian educators.

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[1] This section draws heavily on "Overseas Dependents' Schools of the Department of Defense: Their Origin, History and Unification," a doctoral dissertation by Anthony Cardinale, Director of Dependents Education, Department of Defense, 1965.

In February 1961, the Department of Defense began monitoring the various directives on dependents schools issued by the military services to ensure continuity of policy, and a new position, Deputy Assistant Secretary of Defense (Education), was created. Toward the end of 1962, a committee was appointed to survey the situation and report on methods to bring about improvements in the overseas schools. Perhaps the committee's most significant recommendation was that a civilian Director of Dependents Schools be appointed within the Department. This recommendation was implemented early in 1963.

In 1964, further progress was made toward establishing a cohesive, standardized system. In January of that year, Department of Defense Directive 1342.6 provided for establishment of an overseas dependents school system operated by the military departments under the policy direction of the Assistant Secretary of Defense (Manpower). The directive also divided the system geographically into three areas for academic administration--European, Pacific, and Atlantic. The European and Pacific areas were further divided into school districts, while the Atlantic area, with fewer schools and students, was designated a combination school-area district. The Army was made responsible for schools in the European area as well as those in Turkey, Crete, Libya, Morocco, Ethiopia, and Pakistan; the Navy, for those schools in the Atlantic area; and the Air Force, for those in the Pacific.

In each of the three administrative areas, logistical support was provided by the commanders of each base, but the academic program for all schools became the responsibility of a civilian superintendent assigned to each of the three administrative areas. The area superintendent communicated directly with the Director of the DOD Dependents School Division in Washington, who, acting for the Assistant Secretary of Defense (Manpower), established common policies for the schools. The area offices encouraged principals to set up local or installation advisory councils consisting of the military personnel most involved with facilitating school operations, but such councils did not exist on a regular basis throughout all areas. The councils were not structured to involve parents, teachers, and students in the decisionmaking process and focused primarily on logistics rather than academic matters. Final authority on school matters generally remained with the deputy chief of staff for each of the administrative areas--Europe, Atlantic, Pacific--in which the schools were located.

The Period from 1970 to 1980

In 1974, the first national advisory body was provided for by DOD Directive 1342.6. Called the Overseas Dependents Education Council, its functions were to consider questions of policy, facilitate exchange of information between the military departments and the Director of the Office of Overseas Dependents Education (OODE), and provide advice to the Assistant Secretary of Defense (Manpower and Reserve Affairs). The Council was to consist of a chairman designated by the Assistant Secretary, a representative from each military department, and the Director of Dependents Education, who would serve as executive secretary for the Council. The directive also suggested that other advisory groups, as appropriate, be established by the area superintendents under the direction of the military departments.

The Congress finally shifted total operational responsibility for managing the overseas dependents schools from the three military services to the Department of Defense Office of Overseas Dependents Education, during the appropriations process for Fiscal Year 1976. The House Report of the Subcommittee on Defense Appropriations stated the matter clearly, directing that

> "the Department of Defense centralize the complete operational control and responsibility for the Overseas Dependents Education Program within the OODE.... [P]ersonnel will be under the absolute control and direction of the Office of Overseas Dependents Education....[I]nstallation commanders will have an important role to play in direct support of the entire school program at their installation, but will not be involved in day-to-day administration or operations. This is the responsibility of the school principals and superintendents."

When control of overseas schools was thus transferred to the Department of Defense's Office of Overseas Dependents Education in 1976, the European Command organized the European School Council system, which consisted of committees at the school/installation, community, regional, and European levels. Chaired by the military officer appropriate for each level, each committee generally was composed of both military and civilian staff, a representative of the European Congress of American Parents, Teachers & Students and/or the European Student Council Association (ESCA), and a representative of the committee at the advisory system level immediately below it. The purpose of this three-tiered system was to provide effective means of communication between the commands and the schools and to solve problems common to the European dependents schools. The central Dependents Education Council meanwhile was continued, with a representative from each overseas unified command being added to the membership in 1978.

The Defense Dependents' Education Act of 1978 formally established the Office of Dependents Education within the Department of Defense, with full responsibility for operating the dependents education system. Until passage of this act, authorization of the dependents education system had been contained only in congressional appropriations bills, never in a statute.

Shortly after passage of the act, the Assistant Secretary of Defense (Manpower, Reserve Affairs, and Logistics) approved reorganization of the dependents overseas school system, dividing it into five regions--Atlantic, Germany North, Germany South, Mediterranean, and Pacific. In October 1979, the Panama Canal Treaty Act assigned responsibility for the former Panama Canal Company schools to DOD, thereby creating the sixth region in the overseas school system.

LEGISLATIVE HISTORY

The Defense Dependents' Education Act of 1978 (Public Law 95-561, title XIV) requires establishment of local school and installation-level advisory committees to assure more systematic participation by parents, teachers, students, and military personnel in the operation of the schools (section 1410) and authorizes a systemwide Advisory Council on Dependents Education to advise the Director of the Office of Dependents Education on policy and operational matters (section 1411). Unfortunately, there is no definitive legislative history available on these provisions because the Defense Dependents' Education Act was added as a floor amendment during debate on H.R. 15, and the House Report and Conference Report do not elaborate on the intent of these sections on governance.

The Department of Education Organization Act (Public Law 9688) was enacted in 1979. It authorized the transfer of the overseas dependents schools to the Department of Education and made several modifications to sections 1410 and 1411. The Senate Committee Report gives a detailed explanation of the amendments relevant to school community participation that were made in section 508(j). Emphasis was placed on increasing participation by parents, students, teachers, and school administrators initially in an advisory capacity, with a recommendation that careful consideration be given by the Secretary and the Advisory Council to developing a system more comparable to that in the United States. The following selected quotations from the Senate report illustrate this emphasis:

> "This section makes several amendments to the Defense Dependents' Education Act of 1978 to conform the Act to the transfer of the Dependents Schools to the Department, and to broaden participation by parents and citizens in the development of educational policy and programs.
>
> "The Committee intends that the level of parent, teacher, student and school administrator participation increase with the transfer of the school system to the Department. The Committee has recommended in this report that the Secretary and the Advisory Council on Dependents' Education carefully study the concept of transferring, after the three-year phase-in period, authority of the schools to local, regional, and national-level board[s] of education, much in the same way public education policy is determined by boards of education in the continental United States.
>
> "These amendments broaden participation in the local advisory councils and the national-level Advisory Council on Dependents' Education to include members of professional organizations, school administrators, representatives of parent organizations, and students.
>
> * * *
>
> "The amendments also increase the responsibilities of the Advisory Council on Dependents' Education to include advising the Secretary on the gradual, three-year phase-in and transfer of the Dependents Schools to the Department of Education. The Committee expects this will be an important responsibility of the Council, and that their recommendations will weigh heavily in the Secretary's decisions." [1]

The legislative history not only reinforces the mandate by the Congress for "increasing the participation of parents, teachers, students, school administrators, and members of the Armed Forces in the administration and operation of the schools,"[2] but also looks toward the possibility of giving policymaking power to boards of education at all levels.

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[1] Senate Report No. 96-49, 1st session, p. 89.
[2] Public Law 96-88, section 302(c)

ESTABLISHMENT OF AN ADVISORY STRUCTURE FOR THE OVERSEAS DEPENDENTS SCHOOLS

The Advisory Council on Dependents Education

Statutory Requirement

As provided in Public Law 95-561, section 1411(a), as amended by Public Law 96-88, the Advisory Council on Dependents Education (ACDE) is to be composed of:

> "(1) the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics, and the Administrator of Education for Overseas Dependents of such department, who shall be co-chairmen of the Council;
>
> "(2) twelve individuals appointed by the Secretary of Education, who shall be individuals who have demonstrated an interest in the fields of primary or secondary education and who shall include representatives of professional employee organizations, school administrators, parents of dependents enrolled in the dependents' education system, and one student enrolled in such system;
>
> "(3) a representative of the Secretary of Education and of the Secretary of Defense."

The ACDE is to meet four times a year and its functions are to:

> "(1) recommend to the Director general policies for operation of the defense dependents' education system with respect to curriculum selection, administration, and operation of the system,
>
> "(2) make recommendations to the Director and to the Secretary of Education on the orderly transfer of the functions under the Dependents' Education Act of 1978 to the Secretary and Department of Education, and
>
> "(3) provide information to the Director from other Federal agencies concerned with primary and secondary education with respect to education programs and practices which such agencies have found to be effective and which should be considered for inclusion in the defense dependents' education system.
>
> "(4) advise the Director on the design of the study and the selection of the contractor referred to in section 1412(a)(2) of this title, and
>
> "(5) perform such other tasks as may be required by the Secretary of Education."

Status of Implementation

The Secretary of Education received nominations for 12 individual appointments to the Council from appropriate organizations and constituencies with an interest in the dependents schools. Criteria for selection include the need for adequate representation of women and minorities, the relative concentration of the school population among overseas regions, balance in representation among parents, professional employee organizations, students, and school administrators, and demonstrated interest in education.

In October 1980, the previous Secretary of Education invited a representative from each of the four major military commands in which the dependents schools are located to participate in Council meetings in a liaison capacity.

The charter for the ACDE was signed by the Secretaries of Education and Defense in late fall 1980, and the first meeting of the ACDE is tentatively planned for mid-1981.

Local Advisory Committees

Statutory Requirement

Section 1410(a)(1) states that the Director of Dependents Education (in the Department of Defense) "shall provide for the establishment of an advisory committee for each school in the defense dependents' education system" to "advise the principal or superintendent of the school with respect to the operation of the school, ... make recommendations with respect to curriculum and budget matters," and, except when there is more than one school in an installation, "advise the local military commander with respect to problems concerning dependents' education within the jurisdiction of the commander." Members of a school advisory committee are to "include an equal number of parents of students enrolled in the school and of employees working at the school and, when appropriate, may include a student enrolled in the school."

Section 1410(b) further provides that "the Secretary of Education, in consultation with the Secretary of Defense, shall by regulation prescribe the qualifications for election to an advisory committee and procedures for conducting elections of advisory committee members."

Status of Implementation

On January 2, 1981, the Assistant Secretary of Defense (Manpower, Reserve Affairs, and Logistics) issued an instruction (5105.49) providing procedures for establishing and conducting elections for local advisory committees for the current school year. Previously, on November 7, 1980, the Secretary of Education had published a Notice of Proposed Rulemaking (34 CFR Part 805) in the Federal Register for conducting elections for local advisory committees after transfer of the schools. (See appendix C.) The two Departments worked closely together in developing these issuances to ensure coordination between the two documents with respect to election procedures.

Other Advisory Committees

An advisory panel was also established to satisfy the requirements of sections 1402(b)(2)(A) and 1409(c) of Public Law 95-561, which state respectively:

> "(2) In establishing the defense dependents' education system under subsection (a), the Secretary shall provide programs designed to meet the special needs of—
> (A) the handicapped...."

> "(c) The provisions of the Education for All Handicapped Children Act of 1975 shall apply with respect to all schools operated by the Department of Defense under this Act."

On July 22, 1980, the Department of Defense published the Charter of the Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents. Some schools have also established local advisory committees on special education involving parents and teachers.

ANALYSIS

Public Law 96-88 states that the transfer plan "shall contain recommendations for increasing the participation of parents, teachers, students, school administrators, and members of the Armed Forces in the administration and operation of the schools transferred...." The Senate committee in its report (No. 96-49, p.89) recommended that "the Secretary and the Advisory Council on Dependents Education carefully study the concept of transferring, after the three-year phase-in period, authority of the schools to local, regional, and national-level board[s] of education, much in the same way public education policy is determined by boards of education in the continental United States."

In response to Public Law 96-88 and the Senate report, this section of the transfer plan will briefly compare the degree and type of school community participation in schools in the United States and in the overseas schools and in light of that comparison suggest various ways that such participation might be increased in the overseas school system. This section should be used by the Advisory Council on Dependents Education as a starting point for its consideration of ways to increase participation, as suggested by the Senate report and as part of fulfilling its mandate to "recommend to the Director general policies for operation of the defense dependents' education system with respect to curriculum selection, administration, and operation of the system." (Public Law 95-561, section 1411(c)(1), as amended)

COMPARISON OF SCHOOL COMMUNITY PARTICIPATION IN THE STATESIDE AND OVERSEAS SCHOOL SYSTEMS

Current school community participation authorized for the overseas dependents schools consists of advisory bodies at the local and national level. Although these bodies are being established for the first time this year, it is clear that their roles and decisionmaking authorities are quite limited by comparison with those of boards of education or equivalent bodies responsible for other U.S. schools. In considering possible ways of increasing school community involvement in the overseas dependents schools, it may be useful to examine the ways in which this is accomplished in school systems in the United States.

Boards of Education in School Systems in the United States

Authority for education in the United States is legally reserved to the States. Each State has the right and responsibility to organize and operate its educational system as it deems appropriate.

The assignment of governing authority for public schools reflects funding considerations: in the United States as a whole, local governments in recent years have provided about half of the funding, State governments somewhat less, and the Federal Government slightly under 10 percent. By contrast, the overseas dependents schools are supported exclusively by Federal appropriations.

Formal authority for public education is distributed among a multilevel network of State, intermediate, and local units. Each has particular responsibilities for operating the schools within its geographical boundaries. At each level--State, intermediate, and local--governance traditionally has been vested in an authoritative body, usually called a school board, and in a chief school executive officer, usually called a school superintendent. Although in theory school boards formulate policy and superintendents administer it, in practice many superintendents also influence policy and many boards also participate in some administrative matters. Within this general structure, the locus of educational authority not only varies greatly among States and communities, but in many places is continually adapting to changes in priorities and influence of various education and other interest groups.

Participation at the State Level

State legislatures enact laws pertaining to elementary and secondary education. Within the context of these laws, State education policy and requirements for the elementary and secondary levels are determined in most States by a State board of education and carried out under the leadership of a chief State school officer and professional staff in a State department of education.

Methods of determining membership on State boards of education differ according to State law and tradition. In some States, members are elected directly by the people, in others they are appointed by the Governors, and in still others some board members have status ex officio by virtue of other positions they hold. Methods also vary for selecting the chief State school officer or superintendent, who may be appointed by the State board of education, elected by popular vote, or appointed by the Governor.

The functions of the board and superintendent at the State level usually include activities such as advising the State legislature on education matters, adopting required courses of study, executing the provisions of legislative statutes, distributing Federal and State funds to local education authorities, establishing teacher education and certification requirements, helping improve educational standards through inservice training programs, and providing advisory services to local school boards and superintendents. In Hawaii, a State board of education also operates all school districts.

The new Advisory Council on Dependents Education shares some of the functions and attributes of a State board of education. It includes appointed representatives of parents, professional employee organizations, students, school administrators, and key policy officials responsible for operation of the schools in the Departments of Education and Defense. However, the inclusion of representatives of professional employee organizations and school administrators on the Council varies from common practice in most States, which prohibit membership of school employees on such bodies. To the extent that the Advisory Council on Dependents Education is empowered to act as an authoritative body on school policy and funding issues in future years, the potential for conflict of interest in having representatives of school employees participate directly in setting policies may arise.

Participation at the Local Level

Local School Districts

Each State (except Hawaii) has established local administrative districts and vested them with extensive authority and responsibility for establishing and regulating the schools in their districts. Most local school districts have a board of education, usually elected but occasionally appointed by higher officials. Within the limits of State policy, the board operates the local school system through the school superintendent and staff. The superintendent is normally selected by the school board and directly responsible to it. In recent years, smaller school districts have often consolidated into a county unit, so that the county board and superintendent serve as the local governing unit for the schools in the area.

The functions of the school board in determining education policies, and of the superintendent of schools in executing these policies, include a broad range of duties and responsibilities. The board and the superintendent are usually responsible for preparing the school budget, levying school taxes, and overseeing the operation of the schools. In about 10 percent of U.S. school districts, however, the power to approve budgets and to authorize expenditures is held by the local governmental unit in which the school district is located.

In the overseas dependents schools, there is limited local autonomy since decisions on curriculum, staffing criteria, funding levels, and education policy are currently made on a centralized basis. The recently created local school advisory committees can exert some influence on such decisions, most likely in combination with other such committees in a consensus-building process. Local installation-level advisory committees, which are formed to advise the local installation commander on school related issues and needs under the jurisdiction of the military, are likely to have more direct influence since the military services vest considerable decisionmaking authority and discretion in their local commanders.

Section 6 Schools

Mention should also be made of the so-called "Section 6" dependents schools on military bases in the United States. Funding for these schools was approved in 1950 under Public Law 81-876, title I, section 6, which authorized the Commissioner of Education to establish and oversee the administration of schools on military bases where local public schools were unavailable or inadequate. Currently, there are Section 6 schools on 18 military installations in the United States and Puerto Rico with an estimated enrollment of 37,000 students.

The Education Amendments of 1978 directed the Commissioner of Education to establish locally elected school boards to oversee school expenditures and operations for schools on each military base. Generally, these boards function similarly to school boards in local school districts, except that their actions are subject to the ultimate approval of the installation commander. The boards establish policy, approve the budget, oversee school expenditures and operations, approve personnel appointments, select the school superintendent, and maintain communications between parents and the schools.

The Section 6 schools and overseas dependents schools are similar in many ways. Both are funded exclusively by Federal appropriations, operate on U.S. military installations, and serve dependent children of Department of Defense personnel. There are important differences, however. Section 6 schools are required to ensure that the education provided is comparable to that offered in similar communities in the State, whereas all overseas dependents schools are required to follow a unified approach on policy, curriculum, and other educational standards. There are also major differences between the more limited advisory committee approach in the overseas schools and the approach in the Section 6 schools, in which the school boards enjoy considerably more decisionmaking authority. The benefits of decentralized decisionmaking and diversity in school philosophy, academic standards, and programs must be weighed against the need for continuity for children who move frequently from one school system to another and against the ultimate accountability to the Congress for providing a high quality education to all such children.

As noted earlier in comparing the administrative provisions governing Section 6 school boards and overseas school advisory committees, Section 6 boards limit participation in school board elections to parents of children enrolled in the schools, exclude school employees from serving on the board, and include the school superintendent as a non-voting ex-officio board member. Guidelines for the overseas school advisory committees allow parents, school employees, and students (18 years or older) to vote, require an equal number of parents and school employees to be elected to the committee, and only encourage rather than require the school principal to serve as a non-voting ex-officio board member. Overall, the Section 6 boards closely approximate common practice for local school boards in most States, with the exception of restricting eligibility to vote for board members to parents only.

Participation at the Intermediate Level

In about half the States, an intermediate unit between the State and the local school district coordinates and provides services that local school districts may lack the organization, personnel, funds, materials, and facilities to provide. In counties with multiple local school districts, the intermediate unit is often at the county level.

The intermediate unit consists of a superintendent and, in about two-thirds of the States with intermediate units, of a board of education also. The superintendent may be appointed by the intermediate board, appointed by the State board of education, or elected by popular vote. The board is usually elected by popular vote, but may be elected by representatives of local boards of education.

The services provided by the intermediate school districts may include help with budgets, elections, transportation, building plans, apportionment of funds, personnel problems, educational meetings, data processing, special and vocational education, cooperative purchasing, psychological services, certification, curriculum development, testing, and program evaluation.

The overseas dependents school system is one of the largest school systems for U.S. children and the most geographically dispersed. Schools in three of the six administrative regions (Atlantic, Pacific, and Mediterranean) are separated by thousands of miles. For example, the Atlantic region is headquartered in London, England, but is responsible for schools from Norway to Cuba. Despite these factors, section 1410 of Public Law 95-561 did not call for establishing an intermediate advisory body at the regional or unified command level in the overseas school system to facilitate communications among the widely dispersed local school advisory committees and the Advisory Council on Dependents Education. Many school systems in the United States with low population density and geographically dispersed schools do use intermediate boards.

An intermediate advisory structure was established by the European Command in 1976 to coordinate activities of local school parent-teacher organizations, military commanders, and other groups concerned with the overseas dependents schools. Strong concerns have been voiced by these groups over the absence of statutory authority to continue this intermediate advisory structure.

STRATEGIES FOR INCREASING SCHOOL COMMUNITY PARTICIPATION IN THE OVERSEAS DEPENDENTS SCHOOL SYSTEM

The local school advisory system prescribed by Public Law 95-561 has just been established within the overseas dependents school system. Local advisory committees were elected and began to meet in early 1981, and the national advisory council is scheduled to hold its first meeting in mid-1981. Recommendations for immediate changes or modifications to this system would be premature before the effectiveness of the present system has been evaluated. In view of the congressional mandate that the transfer plan contain recommendations for increasing participation of the various elements in the overseas community in school administration and operation, several possibilities for increasing participation have been identified for further consideration and testing over the next several years. The purpose is to approximate common practices of local, intermediate, and State governance structures for schools in the United States, while recognizing the legitimate limitations and unique requirements of operating a U.S. overseas school system financed exclusively by the Federal Government.

The variables for increasing school community involvement in the overseas dependents schools can be classified under four general headings: The degree and type of decisionmaking authority vested in the various advisory bodies, the method of selecting the members of those bodies, their composition, and the number of advisory levels.

The purpose of this section is to indicate steps that could be taken--individually or in combination--to align the advisory structure of the overseas school system more closely with common practices in school systems in the United States. Much work remains to be done in developing these possibilities further, adapting and testing them in the context of the overseas school system, and reaching conclusions on specific changes that should be adopted.

Variables for Increasing School Community Participation

Decisionmaking Authority

The existing advisory bodies of the overseas dependents schools have no final authority over school administration and operation, whereas most school boards in the United States have substantial decisionmaking powers. There are opportunities as well as some precedents, however, for expanding the degree of influence that an advisory body can exercise in the decisionmaking process.

The first and most directly relevant possibility is to adopt the decisionmaking process used by the Section 6 schools. The Congress has empowered a Section 6 school board under the provisions of Public Law 95-561, title X (Impact Aid Amendments of 1978) to function as a school board to oversee school expenditures and operations, These authorities are limited, however, by the requirement that actions be subject to audit procedures established by the Department of Education and review and approval of the military installation commander. These authorities are also limited by governmentwide policies and regulations governing procurement, civil service personnel requirements, and accountability for expenditure of appropriated funds.

As noted earlier, Section 6 school boards are responsible for school operations on a single military installation and use comparable school districts within the State where they are located as a reference point for formulating educational policies and standards. By contrast, the overseas dependents schools operate worldwide as a single school system and rely on the general policy standards contained in the Defense Dependents' Education Act of 1978. In any consideration of adopting the Section 6 model, attention should be given to determining the appropriate level (local, intermediate, national) at which certain decisions should be made and to identifying the appropriate military and civilian officials responsible for reviewing and approving recommended actions. For example, selecting a school superintendent should include identifying the overseas school officials who are assigned responsibilities comparable to a school superintendent, establishing criteria and a process for evaluating candidates, and determining the proposed relationship of the school superintendent to the board and other civilian military management officials accountable for the schools. Similarly, the appropriate level (school, installation, regional, national) for approving school budgets and policies must be considered. The experience of State, intermediate, and local school boards in the United States in differentiating the decisionmaking responsibilities of each level should be instructive in addressing these questions.

A second possibility is to retain the advisory nature of the current structure but to develop additional methods of strengthening the influence of advisory bodies on decisions by civilian and military management officials responsible for the schools. These methods might include (1) empowering advisory bodies to vote on specific issues in the form of motions of approval or disapproval, and requiring explicit written responses from the appropriate management official on all adopted recommendations; (2) establishing a formal mechanism to appeal management decision contrary to such motions of approval or disapproval to a higher management level; (3) requiring a delay in implementing actions contrary to a board's recommendations for a fixed period to allow the national Advisory Council on Dependents Education to judge whether the matter requires action at that level; and (4) providing for board participation in evaluating the performance of key school officials such as principals, regional directors, and the chief school administrator. While these methods would strengthen the influence of advisory bodies, they should be tempered by the practical need for prompt management action on immediate needs and problems and by an appreciation of the legal and administrative constraints that limit management discretion in operating a federally sponsored school system.

Selection of Members

The method of selecting members to serve on school boards in the United States is normally through direct election by voters residing in a particular jurisdiction or appointment by a Governor, mayor, or other elected official. The current advisory structure for the overseas dependents schools includes both methods--direct election of local school committee members and appointment of members to the Advisory Council on Dependents Education.

One possibility is to adopt the direct election method for local, intermediate (if established), and national advisory bodies. This approach most closely approximates practices in school systems in the United States and would mean electing members for the 12 positions on the Advisory Council on Dependents Education. Another possibility would be for the members to be appointed at all levels. (Since ACDE members are currently appointed, this body would not be affected.) Appointment to the local and intermediate bodies could be accomplished by authorizing each major constituent group (i.e., school management officials, military commanders, parent organizations, professional employee organizations, and student groups) to appoint one or more representatives to the appropriate bodies. This method would provide greater assurance that all major constituencies associated with the overseas schools are represented but is dependent upon the existence of constituent organizations in all overseas school areas. Unlike the direct election method, individuals who choose not to affiliate with a constituent organization such as a parent or professional employee organization would be excluded from participating in the selection process. Various combinations of election and appointment among the advisory bodies could also be considered.

Composition of Advisory Bodies

Consideration must also be given to the composition of groups selected to serve as school advisory bodies. To most closely approximate common practice in the United States, any person of voting age residing in the geographic area served by an overseas dependents school should be eligible to vote and serve. Common practice would also suggest prohibiting school employees from serving although they would be eligible to vote. These practices, of course, reflect the responsibility of residents in U.S. school districts to pay general or special taxes to finance public schools and the authority of elected board members to establish policies, approve budgets, and frequently levy taxes to support school operations.

Another possibility is to pattern the composition of advisory bodies on the Section 6 school board model, which limits eligibility to serve (as well as to vote) to parents or legal guardians of students enrolled in the schools at the time of elections. The exclusion of school employees from Section 6 board membership is consistent with common practice in most school systems in the

United States, but the provisions limiting board membership (as well as voting) to parents is not. The rationale for these differences may be based on the lack of direct taxation of the military base community to support Section 6 schools and the ultimate authority of the military installation commander rather than the school board to approve and implement recommendations.

Advisory Levels

A three-level structure, consisting of local school, regional, and national bodies, would more closely parallel the structures used in many States. Under the recently created system mandated by Public Law 95-561, there is a significant void between the 270 local school advisory committees throughout the world and the single national Advisory Council on Dependents Education. This void has been a particular concern in Europe, where an intermediate-level coordinating committee representing parents, school employees, students, and military commanders exists now but has no statutory basis under the current provisions of Public Law 95-561. Furthermore, an intermediate level would provide an advisory body at the regional management level, thus facilitating coordination between management and elements of the school/military community it would represent--parents, school administrators, teachers, and military commanders.

While an intermediate level would fill a void in the structure and facilitate coordination, it would introduce an additional layer between the local school community and policymaking officials in Washington. Also, an intermediate level based on school administrative regions is not entirely compatible with the military unified command structure. Other possibilities include establishing four intermediate levels coterminus with the geographic jurisdictions of the European, Pacific, Atlantic, and Southern military commands, or establishing a combination of regional and military command-based structures determined by which would work best in each part of the world.

Models for Consideration

An examination of several models that combine various elements of the possibilities just discussed may help clarify the nature of the fundamental choices that exist and the problems inherent in them.

In the simplest terms, the desire expressed by the Congress that the overseas school system consider a structure comparable to the boards of education in the United States will require substantially more local autonomy and administrative decentralization within the overseas school system than exists today. The overseas school system at present is a centrally directed system offering a high degree of uniformity in curriculum, staffing requirements, and distribution of resources among individual schools that range from one small, isolated school in rural Norway to large, urban schools enrolling several thousand students in major European cities. Decentralization would transfer power from the central DoDDS office and the ACDE to regional and/or local school bodies. Such bodies could more easily exercise a substantial policy or decisionmaking role in a system of more autonomous school districts (perhaps based on the six administrative regions or the four military command theaters) held together by a national coordinating body.

The choice of structure centers largely on the desired balance between uniformity of standards and diversity in providing a quality education, with uniformity of standards a product of centralization and diversity a product of decentralization. School systems in the United States continue to struggle with achieving an appropriate balance between these two values in response to the needs and conditions of particular localities and States. It is appropriate that the newly created Advisory Council on Dependents Education and the Secretary of Education carefully consider such questions as the advantages and disadvantages of allowing schools or regions to adopt different standards on course requirements and curriculum, as well as the problems and benefits incurred by introducing elected policymaking boards in a substantially more decentralized system.

Some of the pros and cons for maintaining a centrally directed school system for the overseas schools are listed here. Obviously, the same points could be reversed to obtain the pros and cons for a decentralized system.

- Pros
  - Provides a high degree of standardization and consistency among overseas schools.
  - Strengthens accountability to the Congress for uniform compliance with legislative policy and funding requirements.
  - Assures greater equity in distribution of staff and financial resources among schools.
  - Simplifies administration and relationships with the military services by relying on uniform policies and a single chain of command.
  - Provides for input from advisory bodies without delaying or unnecessarily complicating administrative decisionmaking.
- Cons
  - Management responsiveness to local problems is slower and prompt decisionmaking concerning such problems more difficult to achieve in a centralized bureaucratic structure.

- Parents and other members of the school community located overseas have limited influence upon policy and major operational decisions made in Washington, D.C.
- Incentives to promote local and regional innovation and to test new approaches to achieve educational and management objectives are reduced as a consequence of the time and difficulty associated with obtaining approval and the natural penchant of centrally directed organizations toward maintaining existing practices.
- Lack of diversity reduces opportunities for teachers and school administrators to learn from the experiences of their counterparts, an important strength of the decentralized approach to education in the United States.

The following models portray possible ways of (1) retaining the centrally directed system while increasing school community participation and (2) adopting a more decentralized system with authority in regional school districts while retaining final approval and implementing functions with the appropriate civilian and/or military management official.

A Centrally Directed Model

If one assumes that the centrally directed, unified school system model should be continued, a structure that is advisory in nature and organized around the Advisory Council on Dependents Education as the focal point would represent a realistic and responsive model. Decisionmaking authority of the advisory bodies would be limited to recommendations to civilian and military management officials who, in turn, would be accountable to higher level administrators within their respective chains of command and ultimately to the Congress.

Several possibilities for increasing the influence of advisory bodies on decisionmaking should be considered, with the recognition that final authority is vested in the Federal management structure and the Congress.

Direct election of local, regional, and national advisory body members is recommended as a more systematic and effective method for increasing school community participation in the administration and operation of the schools, and as more consistent with practice in schools in the United States. Similarly, the composition of advisory bodies could be opened up to any member of the school community including but not limited to parents of children enrolled in the schools. Since the advisory bodies have no direct authority and are limited to a recommending role, school employees would be eligible to vote as well as to serve on advisory bodies.

The administrative structure of the system would be expanded to include regional and/or command-level councils to provide a communication link between local school advisory committees and the central Advisory Council on Dependents Education and to take action on those matters that can be resolved more effectively at a lower level.

A Decentralized Model

If one assumes that a more decentralized federation of independent school districts with substantial local autonomy should be adopted in the future, a more authoritative structure should be organized around them as the focal point. Within the statutory limitations established by the Congress on policies and funding levels, policy and decisionmaking authority would be vested in an elected board of education at the regional or military command level comparable to the authority now vested in Section 6 school boards. Such boards would be empowered to determine required courses of instruction and curriculum, approve appointment of staff, approve the consolidated budget for the region, and select the regional school administrator or superintendent--subject to the ultimate review and approval of the appropriate civilian and/or military management official.

Direct election of board members is recommended on the same rationale as for the first model, except that school employees would be ineligible to serve as members to avoid conflicts of interest.

The advisory and school board structure would be based on three administrative levels. Local school advisory committees and a central Advisory Council on Dependents Education would be retained for coordination purposes, but the regional or command-level body would be empowered to act as an authoritative board of education. Locally elected school advisory committees would channel appropriate issues or recommendations to the regional board of education for action, and the central Advisory Council on Dependents Education would function as a coordinating body in working with civilian and military management officials and the Congress on policy and operational matters affecting all schools. The composition of the central advisory council would be altered by replacing appointed representatives of parents, school employees, students, and school administrators with the chairpersons or authorized representatives of the regional or command-level boards of education.

The description of these models is necessarily general and lacking in many specific details. However, they are offered as a means of sharpening the analysis of the implications that flow from the various choices available in designing a structure that increases local participation in the administration and operation of the overseas schools and to indicate the more fundamental issues that should be debated and resolved over the next few years.

RECOMMENDATIONS

1. The Advisory Council on Dependents Education should be assigned primary responsibility for submitting a report to the Secretary of Education, the Secretary of Defense, and the Congress on recommended ways of increasing school community participation in the administration and operation of the overseas dependents school system by May 1983.

   In considering various concepts and models for strengthening school community participation in the overseas dependents schools, a systematic process for further developing and testing alternatives should be developed with full participation by those affected. The Advisory Council on Dependents Education is the most representative body to assume responsibility for this task.

   The Congress should modify the provisions of sections 1410 and 1411 of the Defense Dependents' Education Act of 1978 to permit testing of recommendations of the Advisory Council on Dependents Education for increasing school community participation in the overseas dependents school system.

2. Section 1411(a) of the Defense Dependents' Education Act of 1978 should be amended by a new subsection, "(4) a representative of each unified military command in which defense dependents schools are located."

   The history of the overseas dependents schools clearly indicates that installation and theater-level military commanders have substantial responsibilities for operation of the overseas schools. The absence of specific provisions for full participation of military commanders on the Advisory Council on Dependents Education could limit the effectiveness of the Council in considering policies and operational matters that involve such officials.

CHAPTER II

EDUCATION PROGRAMS AND SERVICES

INTRODUCTION

Section 302 of the Department of Education Organization Act (Public Law 96-88) requires the Secretary of Education to submit to the Congress a plan for effecting the transfer and administration of all functions of the Secretary of Defense and Department of Defense with respect to the operation of the overseas schools for dependents of the Department of Defense, including those functions initially given to the Secretary of Defense and Department of Defense under the Defense Dependents' Education Act of 1978 (title XIV of Public Law 95-561).

Since functions for operating and administering a school system focus directly or indirectly on providing adequate education programs and services, the development of a plan for the transfer of functions must include examination of those education programs and services for which these functions exist.

The Congress expressed a particular interest in the education component of the overseas schools in title XIV, which (1) emphasizes programs for the handicapped, individuals in need of compensatory education, individuals with an interest in vocational education, gifted and talented individuals, individuals with limited English-speaking ability, and preschool children (section 1402); (2) requires an annual education assessment to assure that an education of high quality is provided (section 1405); and (3) requires a comprehensive study, including a detailed analysis of education programs, of the entire defense dependents education system (section 1412).

This particular interest by the Congress in the overseas education program is again expressed in the legislative history of Public Law 96-88. In its conference report (No. 96-49), the Senate Committee on Governmental Affairs stated that it expected the Secretary of Education to make strong efforts to encourage the participation of the overseas dependents schools in vocational education programs, services for education of handicapped and gifted children, library and academic facilities improvement, research, preschool education services, and other programs that would benefit the schools. Given this special concern by the Congress for education programs for overseas dependents, it was appropriate that the conference report contain the following challenge: "The Federal Government has a clear obligation to provide an education of equal or superior quality for the dependents of military personnel."

This strong congressional interest in the quality of education for overseas dependents suggested the necessity to identify any issues related to education programs and services that should be addressed as part of the process of transferring functions for operating and administering the schools. The approach taken in responding to this charge was to gather, analyze, and summarize information concerning DoDDS programs and services from a number of resources, and then to develop recommendations and specify transfer arrangements related to the transfer of education programs and services.

A portion of the resources used in this approach include ongoing contact with various DoDDS constituencies (e.g., parents, administrators, teachers, the armed services, and employee organizations); issue papers developed for specific education areas; available DoDDS reports, issuances, and data; and separate comparability analyses conducted, using a variety of data sources. In addition to these, however, five major activities produced a great amount of data and information as described below. The written reports for these activities are available for examination in ED's Office of Education for Overseas Dependents.

- Overseas Dependents Schools Conference (April 29-May 1, 1980). The transition team conferred with about 50 representatives of the following DoDDS constituencies: Parents, teachers, administrators, members of the armed services, representatives of professional employee organizations, and staff members of congressional committees with a special interest in the overseas schools. The conference produced an extensive list of issues and related recommendations with respect to education programs and services, which were recorded in the conference Proceedings and later considered in developing the transfer plan.

- Teacher Survey on Inservice Training (September 1980). A survey questionnaire was mailed to 25 DoDDS schools representing a cross-section of schools by levels and regions. All the teachers in each sample school were requested to respond to questions related to opportunities for inservice training available to overseas teachers. Specific questions dealt with the nature of recent inservice participation, recent university coursework, involvement in professional activities, and inservice needs. Some 900 questionnaires were completed for a 91 percent response from the sample schools. A survey report summarizes the main findings and conclusions.

- Principal's Report of Programs (October 1980). A questionnaire dealing with education programs and services was forwarded to every DoDDS school by DoDDS headquarters. Each principal responded to questions about existing counts of staff and students for education program degrees and certificates held by staff and additional requirements for education programs and services. Every school principal ultimately responded to the questionnaire, and a summary of the main findings was developed.

- Special ED-DOD Task Forces on Education Programs and Services (November 1980-February 1981). Task forces composed of representatives from various offices in ED, DoDDS headquarters staff, the armed services, and other organizations with an interest in specific education programs developed analyses and recommendations with respect to certain key programs. A separate task force was created for each of the following:

Education for the handicapped, education for the gifted and talented, vocational/career education, education for the limited-English-speaking, compensatory education, preschool education, education media, host nation program, inservice training, and research, improvement, and evaluation. One of the task forces also explored the feasibility of establishing an adult education program in DODDS. The reports developed by each task force were distributed to task force members and the agencies they represented.

- Study of Overseas Education Programs and Services (December 1980 and January 1981). Interviews were conducted with 383 individuals in their overseas school communities. These individuals included the education division staff in four DoDDS regions as well as principals, teachers, parents, students, and installation commanders associated with 20 actual schools. The interviews dealt with the general areas of (1) participation in decisions affecting education programs and (2) adequacy of education programs. The principal findings and related conclusions were developed into a detailed report.

DESCRIPTION

HISTORICAL DEVELOPMENT

Early Years (1946-63)

During the period after World War II, each military service established and operated its own schools, with no coordination between services. Although numerous attempts were made to develop a single system encompassing the schools of all three military services, an agreement to coordinate some aspects of the systems was not reached until 1954. At that time a policy directive assigned specific geographic areas of responsibility for operating dependents schools to each service, established a clearinghouse for school information, and provided that each service should make available to other services copies of various published materials to assist in developing coordinated programs. Nevertheless, each service still determined its own course of study and selected instructional materials independently of the others.

In 1956, with the dependents schooling program growing at a considerable rate (particularly in Europe), a committee composed of representatives of the three services and the Department of Defense studied the operating problems of the schools in the European area. Its recommendations eventually led to passage of the 1962 Defense Department Overseas Teachers Pay and Personnel Practices Act (Public Law 86-91), which established personnel policies closely related to those in most local school systems in the United States.

Efforts to Centralize Planning and Policy (1964-77)

In 1964, when Department of Defense Directive 1342.6 provided for establishment of a single overseas dependents school system operated by the military services under the policy direction of the Assistant Secretary of Defense (Manpower), the Assistant Secretary was assigned functions intended to unify the academic programs of all overseas dependents schools. Specifically, the Assistant Secretary was to determine the general educational goals and objectives of the schools; develop appropriate curricula and lists of approved resource materials for the entire system; provide for the procurement and distribution of school-unique items; establish policies for the common recruitment, selection, assignment, and transfer of all school professional personnel; and develop standards for the effective operation and administration of the academic program. The superintendent of the schools in each area was to be responsible for the area's academic program and was to communicate directly with the Dependents School Division, acting for the Assistant Secretary.

The first concerted effort to establish a unified curriculum and a review system for the overseas schools took place in fall 1974 at a curriculum planning meeting, which developed 10 broad curriculum subject areas. A second meeting the following spring focused on developing the framework of the Five-Year Curriculum Review Plan, which was put into effect for school years 1975-76 through 1979-80. This 5-year plan was followed by another, currently in effect, which will be discussed in the next section.

Development of a Consolidated School System (1978-)

The Defense Dependents' Education Act of 1978 (Public Law 95-561), which by statute gave full responsibility for operating the dependents school system to an office within the Department of Defense, affected the methods by which a quality education would be assured to dependents of the military services overseas in three basic ways: By prescribing regular and special evaluation of the system, by requiring programs to meet the special needs of certain groups, and by broadening participation in the operation of the system as a whole and in the determination of the curriculum and other parts of the education programs.

- Section 1405 of Public Law 95-561 states that the Director of the Office of Dependents Education should assess each year the performance of the system in providing an education of high quality, with the individual results of the assessment being made available to the parents of children tested and with summary results made available to members of the Congress and to professional employees in the system.
- Section 1402 lists the groups whose special needs are to be met--the handicapped, those needing compensatory education, those interested in vocational education, the gifted/talented, and those with limited English-speaking ability.
- Sections 1410 and 1411, discussed more fully in the preceding chapter, provide that advice and recommendations concerning the operation of the schools and the determination of curriculum should be given by local committees and a national council whose members include parents, school employees, students, school administrators, and representatives of professional employee organizations.

STUDENT POPULATION

Of the 135,624 students enrolled in DoDDS in 1980-81, the great majority attend on a tuition-free basis as dependents of members of the armed services assigned overseas. The remaining students, all tuition paying, are dependents of overseas Americans who are either other Federal employees, workers from the private sector under Federal contract, U.S. citizens in various occupations abroad, or foreign nationals. Spaces in the schools are required for some categories of tuition-paying students, while others may enroll only if space is available. In addition to the students enrolled in DoDDS schools, approximately 3,000 DOD dependents enroll in private schools abroad on a tuition-fee basis, because their military sponsors are assigned to areas where no DoDDS schools are located.

Currently, about 94 percent of the students enrolled in DoDDS schools are military dependents. This proportion varies only slightly in five of six DoDDS regions, from 97 percent in Germany North and Germany South to 92 percent in the Mediterranean, but is just 67 percent in Panama. The significantly lower percentage in Panama as compared to the other DoDDS regions is explained by the large number of U.S. civilians employed by the Panama Canal Commission in the former Canal Zone area.

The profile of DoDDS students is fairly representative of the extended middle portion of students who attend public schools in the United States--that is, few if any of the very rich or very poor are found in DoDDS schools. Mainly military dependents, DoDDS students are very mobile and therefore rarely attend the same school for more than 3 consecutive years. Students' aptitudes are high and, on the average, DoDDS students perform at least as well or better than their counterparts in public schools in the United States.

An exact racial/ethnic profile of DoDDS students is not presently available, because this information is not collected routinely by the school system. However, since the great majority of students are military dependents, it is reasonable to expect that their profile would be similar to that of the armed services personnel. Figures provided by DOD show that the 1980 racial/ethnic profile of the armed services in those overseas communities in which DoDDS schools are located is about two-thirds white and one-third minority. These figures refer only to DOD personnel overseas, not to their dependent child or children, if any. The racial/ethnic profile of students enrolled in DoDDS schools could differ somewhat because of several factors, including the racial/ethnic background of the spouse, the number of children enrolled from each family, and the fact that many members of the military services are relatively young, unmarried enlisted personnel. The percentage of overseas armed services personnel in various racial/ethnic categories is shown below by geographic region.

	White	Black	Hispanic	Asian/ Pacific Islands	American Indian/ Alaskan Native	Unknown
All regions ----	66.7	25.3	4.0	0.7	1.9	1.4
Atlantic -------	76.4	17.6	2.9	1.1	1.3	0.7
Germany North --	66.9	26.4	3.8	0.7	1.0	1.2
Germany South --	62.6	30.5	4.1	0.4	0.8	1.6
Mediterranean --	74.8	17.1	4.5	1.2	1.5	0.9
Pacific --------	65.2	24.3	3.3	0.8	4.6	1.8
Panama ---------	52.0	30.5	13.7	0.5	0.6	2.7

The proportion of minority members of the armed services has risen steadily in recent years. For the years 1976, 1978, and 1980, for example, the proportion of total military personnel--overseas and in the United States--who were minorities was 22 percent, 25 percent, and 28 percent, respectively. Data on current armed services accessions suggest that in the 1980's the proportion of minority members in the service will continue to be at least 1 to 3.

INSTRUCTIONAL PLANNING

The central aim of the DoDDS system is to provide a quality education for all children attending its overseas dependents schools. To this end, a system of planning, review, and evaluation has been established in a 5-year curriculum review cycle. Another potential resource for instructional planning is the periodic examination of individual schools by the North Central Association of Colleges and Schools (NCA), a major U.S. accrediting association, with a view to accrediting them as member institutions.

The 5-Year Curriculum Review Cycle

First established for school year 1974-75, the 5-year curriculum review cycle is a coordinated system of review and evaluation that is intended to involve all levels of the system. In keeping with systematic approaches to planning, delivering, and assessing education programs in many stateside schools, it attempts to provide general procedures for curricular decision-making for the entire school system, while preserving some freedom of choice to those who are actively engaged in teaching at each local school. This approach to curricular decisions assumes that a school system must maintain a continuing dialogue, not only with the educational staff in the field, but also with curriculum developers and publishers, professional education associations, State departments of education and local school systems in the United States, Federal education agencies and organizations, and other groups concerned with positive action in the area of curriculum and instruction. The curriculum plan is viewed as part of an evolving process of curriculum review and development. The DoDDS curriculum development process is designed to be flexible in order to facilitate implementation of innovative ideas, programs, and procedures based upon experience and evaluation results.

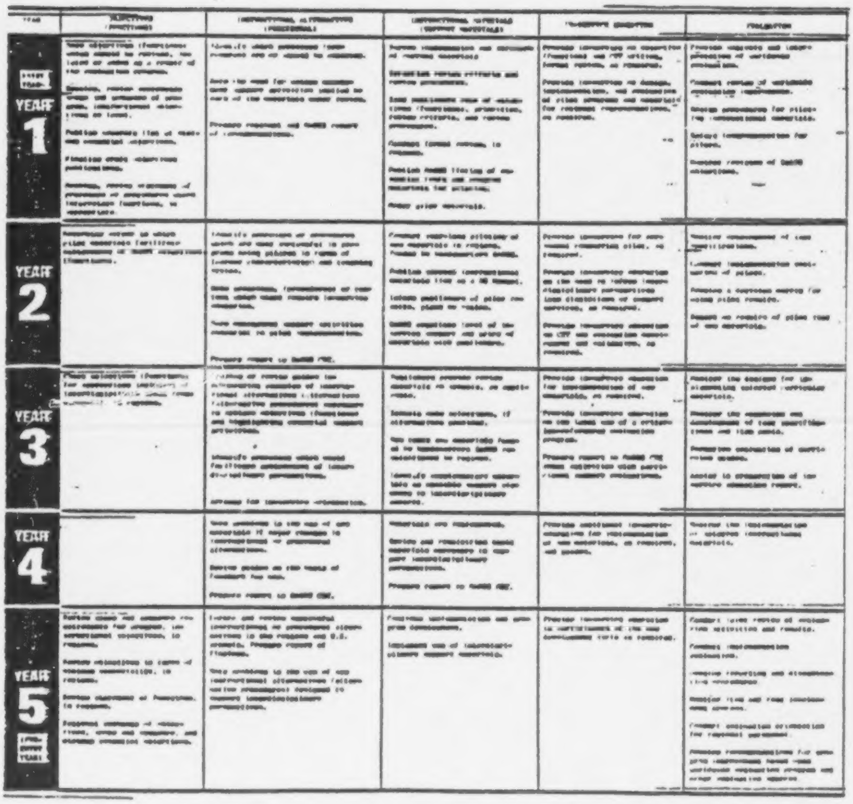
The first 5-year curriculum review cycle was called the Five-Year Curriculum Review Plan and was instituted for school years 1974-75 through 1979-80. The current cycle, the Five-Year Curriculum Development Plan, covers 1980-81 through 1984-85. It reflects the experience gained through use of the former plan, expanding and refining it to adapt to the changing needs of the school system.

The 5-year cycle contains five discrete components for each year in the instructional review process. These five components are (1) formulation of instructional objectives, (2) identification of instructional (procedural) alternatives, (3) selection of instructional (procedural) materials, (4) conduct of inservice education, and (5) evaluation. Each year three educational programs enter the cycle, so the 15 educational programs are staggered throughout its five stages. The cells of table 1 show the kinds of activities related to particular years and components that are to be conducted for each education program over a 5-year period.

The Curriculum Development Plan is the responsibility of the DoDDS Curriculum Development Committee, which consists of the chief of the Education Division in each of the six regions and the chief of the Education Division and of the curriculum and evaluation branches in the central Office of Dependents Schools (ODS). The committee is chaired by the chief of the ODS Education Division. A task group is also set up for each education program as it enters the cycle. Each task group consists of the coordinators for the education program in each of the six regions and in ODS, with the coordinator from ODS chairing the group. There is also a special task group on evaluation, consisting of the chiefs of the evaluation branch in each region and in ODS.

Each task group performs the activities or tasks specified for all components in its education program and makes recommendations to the DoDDS Curriculum Development Committee for review. The Committee then coordinates with ODS Logistics, Fiscal, and Personnel Division chiefs as appropriate, finally making recommendations to the Director of DoDDS. Upon approval by the Director, a recommendation becomes policy.

Table 1. DoDDS Five-Year Curriculum Development Plan



Accreditation

Beginning in 1946, the North Central Association of Colleges and Schools (NCA) has been periodically evaluating DoDDS schools. The NCA was selected because it is the largest of the six regional accrediting associations in the United States, having about 4,700 member colleges and schools in 19 States and overseas. The concerns of the NCA are primarily implementation of a comprehensive education program, pupil-teacher ratios, school facilities, school supplies, administrative services, and teacher qualifications. Results of the NCA evaluations will be discussed in the analysis section.

Accreditation has been extended to middle and junior high schools since 1973 and to elementary schools since 1976. All DoDDS schools that have been evaluated have been awarded accredited status, including 60 high schools, 7 middle/junior high schools, and 38 elementary schools. Twenty additional accreditations are underway, and it is expected that by spring 1982 all DoDDS schools with an enrollment of 150 students or more will have been accredited by the NCA. The remainder, which are small either because they are special purpose schools or because there are few DoDDS students in their areas, will be examined internally by DoDDS according to predetermined criteria. Two high schools in Panama were accredited by the Middle States Association before the Panama region joined DoDDS. The DoDDS projected timeline for all schools (except those with very small enrollments) to be accredited is by the close of the 1984-85 school year.

NCA requires an annual status report from each school, which includes an audit of the credentials of new teachers and teachers who have been reassigned. NCA regularly conducts onsite reviews of schools overseas to evaluate the state of the educational programs of accredited schools (secondary schools every 3 years and elementary schools every 6 years). Each April and October several NCA teams, comprised of two experienced stateside educators, conduct onsite reviews of five or six schools each. The primary emphasis of the onsite review is on such resource factors as pupil-teacher ratios, school facilities, supplies, administrative service, teacher qualifications, and adequacy of the comprehensive program. Their written reports with recommendations are presented to the central office and the overseas directorates. Accredited schools must comply with standards in all areas. If a school falls short or violates a standard, it receives a citation. No DoDDS school has ever lost its accreditation because of failure to correct a cited deficiency.

Appendix E presents June 1980 accreditation data by region and level. Accreditation reports concerning DoDDS schools will be discussed in the section on analysis.

PROGRAMS AND SERVICES

Administration

The organizational arrangement in DoDDS headquarters corresponds closely to that of the education programs and services themselves. The Education Division, administered by a division chief, is responsible for all education programs and services. The division is divided into branches, each headed by a branch chief who is responsible for curriculum, supplementary education, and evaluation, respectively. The curriculum branch has a program coordinator for virtually each subject area: Arts and humanities, career education, foreign language/intercultural education, host nation, health/physical education, language arts, mathematics, reading, science, and social studies. Likewise, there are coordinators in the supplementary education branch for accreditation, compensatory education, computer education, educational media, pupil personnel services, and special education. The evaluation branch consists of a branch chief and three coordinators who are concerned with basic skills assessment, program evaluation, and research and improvement activities. Each of the six regions also has an education division with an organizational structure identical to that of the DoDDS central office. Through a cooperative system and working through the Five-Year Curriculum Development Plan, these coordinators and their branch chiefs effect the decisions concerning the various subject areas that have been made by the DoDDS Curriculum Development Committee through a process described earlier.

Overview of Programs and Services

Education programs and services as well as graduation requirements in DoDDS schools closely resemble those in most other U.S. public schools. At least 18 units of credit are needed to graduate from grade 12, of which 12-1/2 must be in required fields. A substitution of 1/2 unit of a specific minority studies course may be made for a required 1/2 unit in language arts, arts and humanities, or social studies (except for the required units in U.S. history and government). As in the States, the number of electives offered in a particular school is dependent on the size of the school.

Language arts	4
Social studies (to include 1 in U.S. history and 1/2 in U.S. government)	3
Mathematics	1
Science	1
Career education	1
Arts and humanities	1
Physical education	1
Health education	1/2

The basic curriculum consists of the following programs:

- Arts and humanities
- Career education
- Foreign language/intercultural education
- Health and physical education
- Language arts
- Mathematics
- Reading
- Science
- Social studies

Supplementary programs and services include the following:

- Computer education
- Educational media
- Extracurricular programs
- Host nation program
- Inservice education
- Pupil personnel services
- Research, improvement, and evaluation

Still other special programs are offered that will be grouped together here as "title XIV" programs, because Public Law 95-561 lists them in section 1402(b)(2) as programs that are to be provided to meet special needs. Title XIV programs include the following:

- Compensatory education
- Education for the gifted/talented
- Education for the handicapped
- Education for individuals of limited English-speaking ability
- Vocational education

Two more programs are under consideration--developmental preschool education and adult education. The former is required by section 1402(b)(3) if it is not otherwise available and if there are funds for it. The latter, adult education, was offered in dependents overseas schools from 1971 through 1975 and was examined by the transition team as a possible addition to DoDDS education programs. Background information about these two programs will be given in this section.

Each component of education programs and services is described in this section under one of the following categories: (1) Basic Curriculum, (2) Supplementary Programs and Services, (3) Title XIV Programs, and (4) Programs Under Consideration. Those programs for which special ED-DOD task forces were created, as discussed in the introduction to this chapter, are described more fully--and subsequently analyzed more thoroughly--than other programs that may be equally important in the total educational picture (e.g., reading).

Basic Curriculum

Arts and Humanities

In the DoDDS system, the arts and humanities are considered to include, respectively, those creative expressions that are written, visual, musical, performed orally, and filmed or recorded in any culture at any period of time, and those disciplines that develop understanding of attitudes and values found in the growth of mankind and cultures. The arts and humanities are to be intercultural and interdisciplinary and assist learners in expanding awareness of their own growth and responsiblity for contributing to culture.

Within the last several years, the three subjects of art, music, and humanities have been combined administratively as "arts and humanities," with one coordinator in headquarters and in each region for the combined field. In September 1979, a brochure describing the objectives of the program was published and distributed during the following year to all teachers. The purpose was to clarify the objectives and explain the use of materials to elementary classroom teachers and to teachers of other disciplines so that they would understand how the arts and humanities might be integrated with the work in their classes. The brochure was prepared by headquarters in extensive collaboration with regional coordinators, elementary teachers, and secondary teachers of all disciplines.

In conjunction with the DoDDS Five-Year Curriculum Development Plan, a comprehensive materials review was held during spring 1979, with the result that selected arts and humanities materials are being piloted in school year 1980-81.

The number of courses offered and the staffing of the arts and humanities varies greatly by school and region, depending upon school size and the interest of the region. Most schools have the services of a specialist in art and music for short periods of time per week and some have additional staff in the field. The Pacific region has placed considerable emphasis upon the arts and humanities, with a program including such activities as sponsoring an artist-in-residence. The regions in Germany have been particularly active in host nation activities that go beyond sightseeing and concertgoing field trips to bring students into frequent and meaningful contact with students and other citizens of the host nation. This type of intercultural experience is considered an important part of the arts and humanities program and is being encouraged throughout the system.

Communication between professional staff interested in furthering the arts and humanities program is aided by periodic regional workshops in each of the three areas--art, music, and humanities. A combined arts and humanities workshop was held in Germany in 1979 for about 300 interested staff from the Atlantic, Germany North, Germany South, and Mediterranean regions.

Career Education

A comprehensive kindergarten through grade 12 program, career education fosters the development of self and career awareness, career exploration, decisionmaking, career preparation, and placement. The career education program is for all students, whether bound for college, vocational-technical schools, military service, or immediate entry into the job market after graduation. Career areas include business education, home economics, industrial arts, automotive technology, cosmetology, electricity/electronics, graphic arts, Junior ROTC, medical/dental assistance, photography, and computer technology. About 476 teachers are assigned to career education programs, and 8 are employed full-time to coordinate career education activities at large school complexes.

Career education will be discussed more fully under Vocational/Career Education as one of the title XIV programs.

Foreign Language/Intercultural Education

The program in foreign language/intercultural education aims to enable students not only to communicate in another language, but also to appreciate other cultures. A total of 17 foreign languages are taught in different regions, with French and Spanish being the only languages offered in all regions. An important aspect of the foreign language program is the host-nation program, in which the host nation culture and language are to be taught from kindergarten through grade 12 by full-time host nation teachers. This will be discussed later as a supplementary education program.

Health and Physical Education

Although administered as a single unit, the health and physical education program is divided in practice into two parts. The health education program is defined to include mental health, family life and human development, safety and accident prevention, nutrition, consumer health, positive health practices, substance use and abuse, environmental health, and career opportunities. Physical education is defined as education of, by, and through human movement. It contributes to the total growth and development of the child through selected movement experiences and physical activities. Program objectives emphasize strength; endurance; flexibility; perceptual-motor, fundamental movement, and sport and dance skills; intellectual skills and abilities; and a healthy response to physical activity. Participating in and studying physical education should enable students to explore their physical capabilities and develop a value system in which physical activity becomes important in their lives.

Currently, DoDDS reports 177 personnel on board (62 physical education teachers and 115 nurses). An additional 97 spaces are projected through FY 1984 to meet the needs of the student population.

A task group composed of DoDDS regional health/physical education coordinators has been working to develop a program scope and sequence.

Language Arts

Skills in the language arts are to be developed in the overseas dependents schools through actively involving students in listening and speaking, composition, spelling, literature, and language. Systemwide program objectives for the programs state that the learner should comprehend spoken standard American English, communicate orally in a variety of situations, and write for a variety of purposes. A current emphasis is on helping students acquire a mastery of spelling.

Two to three weeks of intensive inservice training in teaching writing has been completed by over 200 elementary and secondary teachers in the National Writing Project, previously known as the Bay Area Writing Project. The training helps teachers to acquire new techniques that will improve students' writing skills. In summer 1981, such training is to be received by 30 to 40 teachers at each of four sites overseas.

Mathematics

The curriculum in mathematics is designed to enable students to identify the uniqueness of numbers, their meanings, and relationships; acquire proficiency in computational skills; apply computational skills and mathematical reasoning in solving problems; collect, reduce, display, and interpret data into meaningful and relevant terms; perform measurement in both metric and customary systems using appropriate tools; use mathematical data and concepts to make predictions; know and apply geometric concepts; and understand the capabilities, applications, limitations, and implications of computer technology in our society. In accordance with the Five-Year Curriculum Development Plan, decisions of the Curriculum Development Committee were implemented in the 1980-81 school year, including distribution of hand-held calculators for most students in grades 4 through 6. Teacher inservice and parent information sessions were scheduled before distribution of the calculators.

The trend in recent years, both in DoDDS schools and nationally, has been toward an increase in problem-solving and technology. Membership of many overseas teachers in the National Council of Teachers of Mathematics helps teachers and coordinators become aware of current thinking and practice in the field.

Reading

The overall objective of the reading program is that the learner should read functionally and recreationally. This objective is to be accomplished by active and full participation in the community of language through listening, speaking, reading, and writing to explore and discover the world and to communicate with that world. The reading program is designed so that students may progress at their own rates. It is planned to be a continuing and ongoing process that focuses on improving an individual's basic reading skills in a systematic manner. The approach is basal, with a balance of instruction in language, decoding, comprehension, and recreational reading. Inservice training is provided by the regions during the summer and at school-level workshops during the school year.

The DoDDS reading program has taken several new steps in recent years. Following the national trend, the DoDDS schools have begun to expand reading instruction into the 7th and 8th grades in an attempt to help all students master effective reading skills before entry into high school. In these grades, reading comprehension is taught as a component of English classes to all students requiring it. Currently, the Pacific region offers this expanded reading instruction in all schools, and efforts are being made to encourage the practice throughout the system.

An attempt is also being made to provide most schools with a reading improvement specialist (RIS) in addition to classroom teachers. The intent is to have the RIS work with teachers, principals, and other specialists. An additional new challenge to the RIS is METRA Reading, a project recently introduced into some DoDDS schools. This program is an organized, structured approach to remedial reading that is based upon a tutorial model. It uses students, paraprofessionals, and nonprofessionals as tutors and prescribes specific techniques for teaching different aspects of the total reading process on a one-on-one basis. Although there is a tremendous effort required of the RIS to initiate the program, train tutors, individually test all students (tutors and learners), and coordinate their efforts, RIS's find that it significantly improves the reading skill of their students. In school year 1980-81, a total of 145.5 RIS's (full-time equivalent) were working in the DoDDS system (Atlantic--12.5, Germany North--49, Germany South--34, Mediterranean--18, Pacific--32, and Panama--0).

Science

The purpose of the science program is to prepare all students to be scientifically literate citizens by teaching them to apply content and concepts from the biological, physical, and earth/space sciences; use processes of science in solving problems, making decisions, and furthering understanding; understand the nature of science; evaluate the interrelationships among science, technology, and society; demonstrate scientific attitudes; and develop science-related values that result in action constructive to the environment. The program has progressed from one based upon reading and hearing about science to one in which the students have a much greater opportunity than before to question facts, manipulate materials, and hypothesize concerning questions provided by the universe. In the elementary grades, science is usually presented by the classroom teacher, but in junior and senior high grades by teachers certified in one or more of the DoDDS science position categories.

As in elementary schools within the United States, the time given to science in the elementary grades by the classroom teachers is minimal. Efforts have been made to improve this situation by making accessible to DoDDS elementary science teachers a selection of complete science programs, including both texts and kits. In school year 1980-81, science coordinators are monitoring this new program to discover which program is being chosen most often in the classroom and why.

DoDDS is in the process of developing regulations on safety standards and procedures related to the teaching of science as part of a more extensive regulation on safety and security practices in the schools.

Social Studies

The curriculum in social studies provides learning experiences for students that are to aid in developing skills, knowledge, values, and attitudes necessary for participating in a multiethnic and multicultural global society. The specific major goals are to evaluate the relationships between human beings and their social, natural, and manmade environment; analyze the origins and interrelationships of beliefs, values, and behavior patterns; solve problems; develop the human relations skills necessary to communicate and work with people; develop a positive self-concept and move toward self-actualization; and develop a commitment to the right of self-determination for all human beings and a willingness to take rational action in support of means for securing and preserving human rights.

The DoDDS social studies program has recently completed the fifth year of the curriculum review cycle. DoDDS published an extensive report, Comprehensive Social Studies Program Evaluation, in February 1980. Copies of the report were distributed to all schools, and highlights of the report were distributed to all teachers.

Supplementary Programs and Services

Computer Education

The program in computer education includes instruction and hands-on experiential learning in the classroom. Student instructional needs vary from general computer literacy to actual acquisition of entry-level vocational skills. To become "computer literate," students need to develop understanding of the capabilities, applications, limitations, and implications of computer technology in our society. Entry-level skills in the computer sciences run from flow charting and keypunching through programing in BASIC and several other languages to understanding computer systems themselves. Used by the students in mathematics and science classes, the computer has proved to be a tool for motivating students and reinforcing previous lessons. In handling all calculations precisely and instantaneously, it frees the student to concentrate on the underlying concepts and operational logarithms used in solving problems. Computer programs for assisted, simulated, developed, and managed instruction are becoming increasingly available to all academic disciplines and may be used for students for drill, practice, tutorial instruction, and dialogue as well as to simulate real situations in order to learn more about the process.

In 40 schools in the system, computer education programs are offered and administrators use data processing equipment. The demand for technology is high at the local school level. Some schools have purchased microcomputers financed by local parent organizations and teachers. To help meet the local demand for computer education, ongoing inservice programs of various types have been made available in all regions to teachers at all levels and in all subjects to acquaint them with the materials and methods for classroom use of computer technology.

Educational Media

The program in educational media represents a combination of resources that include people, materials, equipment, facilities, services, and environment. Its purpose is to help students (1) understand the organization of the media center in each school and the commonly accepted procedures governing its use; (2) understand the types of materials and equipment in the center; (3) select and use appropriate media center resources; (4) select, produce, and evaluate an original project; and (5) develop a lifelong appreciation for various modes of communication.

Staff.--Every school except some with small enrollments has a media center that is staffed with a full-time professional media specialist. Larger schools have additional professional, technical, and clerical personnel. The system employs the equivalent of almost 200 full-time professional media personnel and 177 clerical and technical support personnel. In some smaller schools, teachers or clerical staff serve part-time in media centers. Appendix F presents detailed data on the program for school year 1979-80. There are 79 schools (most with low enrollments) that have no full-time professional media specialists--17 in the Atlantic, 20 in Germany North, 29 in Germany South, and 13 in the Mediterranean. Some of these schools may have a teacher assigned to the media center either part-time or full-time. Each region also has an educational media coordinator to provide program assistance to its schools.

Resources.--About 12 film libraries throughout the system supplement print and nonprint resources in school media centers and offer local production facilities. About 18,000 pieces of audiovisual equipment are available throughout the system. Their maintenance and repair, which is contracted to local firms or arranged for through the military services, have often been inadequate and subject to extended delays.

Regional differences.--Because decisions about priorities are made by the regions, there are considerable differences among them in terms of money allocated to the media program and thus in staff support and in the nature and extent of services, collections, and equipment. (See appendix F, item 7.) For example, the Germany South region has an outstanding professional collection, left from the time it served as headquarters for the former European region, whereas in other regions the professional collection is minimal or nonexistent. Germany South also has a full-time professional librarian and a media aide in the regional office. All regions except the Panama and the Pacific are spending significantly less than the DoDDS recommended standard for print and nonprint purchases. Expenditures in the Panama region reflect an effort to meet accreditation standards. The Pacific region has traditionally demonstrated a fiscal commitment to the media program.

DoDDS plans.--Plans for the educational media program include the following:

- To phase in purchases of videocassette playback/recorder units, monitors, and cameras for all schools. Most schools in the Pacific region already are equipped with videotape recorder (VTR) equipment. Funds for future purchase of VTR equipment will be distributed to the regions in proportion to their enrollment. Funding for this is to be requested for FY 1982-83.
- To phase in placement of a television production studio into one high school in each region to provide formal instruction in TV production for students and to prepare instructional and inservice training tapes for circulation among schools and regions.
- To sponsor a series of videotape production workshops for teachers, school administrators, and regional staff in school year 1981-82 and 1982-83 to ensure that equipment receives effective use and to help support the objectives of all DoDDS educational programs.

Funding.--In school year 1979-80, total DoDDS expenditures for all media program requirements were about $2.6 million, which represents only 57 percent of the total of about $4.6 million recommended by DoDDS headquarters in its approved standards for the media program. The Panama region alone spent over 25 percent of the total of $2.6 million to supply and equip eight schools that previously had no media centers. When the amount spent by the Panama region is removed from the calculations, the other five regions spent only 45 percent of the recommended minimum funding of $4.6 million. Total and per pupil expenditures by region were as follows:

	Total	Per pupil
Total	$2,628,973	($19.33)
Atlantic	172,620	11.60
Germany North	620,500	13.80
Germany South	420,217	12.44
Mediterranean	115,612	8.84
Pacific	630,379	29.19
Panama	669,645	86.98

Extracurricular Programs

DoDDS does not offer a systemwide extracurricular program with identical activities for each school. The same kinds of extracurricular programs are conducted in most schools in the system (particularly in secondary schools) such as competitive sports programs (i.e., football, basketball, track and field, etc.) and many nonathletic programs (i.e., drama club, band, yearbook, etc.). However, the full range of activities in such programs can vary from school to school. Insufficient after-school activities, including intramural sports programs, characterize many schools. On an individual school basis, activities may be developed that fit the interests of that school community (e.g., ski clubs in many locations in Germany).

Host Nation Program

The location of the DoDDS schools in other countries--the host nation setting--is a unique characteristic of the DoDDS system. This cultural environment holds great potential for enriching the educational experience of all the students and teachers and for contributing to the development of programs for intercultural/international understanding in the United States.

As stated in a DoDDS manual, the objectives of the host nation program at present are to--

- "Appreciate the host nation's culture and values:
    - Show interest in learning representative anthropological, historical, geographical, sociological, educational, religious, and economic aspects of the host nation.
    - Show sensitivity to cultural traits of the host nation people.
    - Show interest in selected examples of art, literature, drama, dance, music, sports, and crafts of the host nation.
    - Value contributions of the host nation people to world civilization.

- Display interest in experiencing the way of life of the host nation people."

* * *

o "Appreciate the cultures and values of the target language:

- Display interest in knowing specific facts related to the culture(s) of the target language.
- Value the fact that there is more than one acceptable style of living.
- Appreciate the various arts and recreational activities of the target language culture(s)."

The Host Nation Task Force limited its focus of concern to the host nation program as presently conceived and to an ambitious view of its full potential. It did not endeavor to deal with the regular full-time foreign language program in the curriculum, which is administered by DoDDS as a separate but related area.

Program.--It is the general policy intention of DoDDS that all students at all levels be given the opportunity to participate in the host nation program and its activities. The program currently aims to give some attention to study of the local country at every grade level and, in one way or another, in most curriculum areas at various stages from kindergarten through grade 12.

In times past the primary emphasis was on learning the language of the host nation, whereas in recent years the program has endeavored to provide for all students a broad basis of orientation to the local culture, including some attention to the local language, and to offer as an elective at the secondary school level the opportunity for systematic formal study of the local language as part of the regular foreign language program. The languages and cultures of the host countries--and therefore those that are most important to the host nation program--are the following: Arabic, Dutch, English, French, German, Modern Greek, Icelandic, Italian, Japanese, Korean, Latin, Norwegian, Tagalog (Philippines), Portuguese, Spanish, Turkish, Flemish, and Walloon. Chinese and Russian are also offered in some schools.

At the elementary level there are several patterns for the host nation program. In some schools, the teachers rotate through the various classrooms, while in others they have their own room and the students come to them. In either pattern, every student devotes approximately 2 hours a week under school auspices to learning about the host country. School programs give attention to many facets of the host nation, including history, geography, economics, religion, food, music, literature, sports, arts, and crafts, with an introduction to the language of the host nation as an important element in the program. Opportunities are sometimes provided for direct contact with the host country through field trips and other activities outside the classroom.

At the secondary level, the host nation program is not offered as a separate course or unit, but rather as a variety of opportunities available within regular courses and extracurricular activities. The latter sometimes includes field trips, joint seminars, workshops, and sports competitions with students from the host nation as well as visits to art galleries and museums, and attendance at concerts and at diverse local or national festivals. Sometimes specialists from the host country are invited into the classroom to serve as resource people on various aspects of local or national culture. Also, various cultural components are normally included in the formal foreign language courses.

Teachers.--The existing host nation program is staffed by approximately 300 full-time host nation teachers. Virtually all are citizens of the respective host nations, and most are employed at the elementary school level.

Organization and planning.--Before establishment of a centralized organizational framework for DoDDS, the host nation program, like other curriculum areas, was the responsibility of the individual regions and was more localized than most aspects of the curriculum because of the great diversity of host nation settings. Since establishment of the present DoDDS structure, initial responsibility for the host nation program has had to be shared along with a number of other responsibilities by the small number of headquarters curriculum coordinators. Last year, additional coordinators were added to the staff and responsibilities for the host nation program (and subsequently for English-as-a-second-language as well) was included in the role of the foreign language coordinator. There are coordinators in the six regional offices who are responsible for the host nation program, as well as for others, within their respective regions.

Since the recent establishment of a centralized organizational framework for the overseas dependents schools, it has been the primary objective of the coordinators to review the needs of the host nation program for the system as a whole. DoDDS has begun the process of strengthening host nation approaches and programs through systemwide cooperative effort. Progress to date includes an initial step toward developing common general objectives, as seen in the DoDDS manual, Foreign Language & Intercultural Program, published in September 1980 (and quoted in the beginning of this section). Activity is proceeding in all six DoDDS regions toward a systemwide cooperative revision of the very useful publication of a decade ago (1971), Moving Outward/Intercultural Education, produced by what was then the European region of the dependents school system.

Inservice Education

The purpose of inservice education in DoDDS is to improve the education programs of the overseas dependents schools by increasing the effectiveness of teachers, administrators, and paraprofessionals through planned programs of training in the use of current instructional materials, teaching strategies, and administrative and teaching techniques.

Inservice education has existed throughout the history of the dependent school system. Each of the various regions and districts has offered inservice opportunities to the teachers and has designed and administered its own distinct inservice program. In most cases workshops were initiated either because of the results of needs assessment questionnaires or the perceptions of district coordinators.

Organization and planning.--Recently, planning for inservice education was begun on a systemwide basis by an Inservice Task Group, consisting of a representative (the coordinator) from each region. One of its functions is to conduct a formal needs assessment annually throughout the system. In the assessment process, each educator is given a questionnaire concerning his or her inservice needs. When completed, these questionnaires are reviewed at the school and regional levels and are analyzed for the educators' categorical and specific inservice needs, leadership potential, and awareness of inservice program offerings. This formal planning is related to the Five-Year Curriculum Development Plan, annual budget, and legislated requirements.

ODS reports that while the needs assessment procedure is occurring, an informal ongoing assessment of inservice opportunities, resources, and legislated requirements is being made by specialists and administrators responsible for educational programs and that pertinent information collected is shared with the schools. Following the assessment, regional education division staff estimate overall costs and submit budget requests for inservice training based upon both formal and informal needs assessments.

When special or substantial resources such as additional substitutes or consultants are required for an inservice project, a proposal form requesting those resources is completed by regional educators and is reviewed at the next higher level against established criteria. School and other regional projects with an estimated unit cost of $15,000 or more are prioritized by the regional office and reviewed at ODS by the Inservice Task Group. Projects with the highest ratings are recommended for endorsement by the DoDDS Director and ultimately administered by the regions using their own budgeted resources. Those inservice proposals that originate at ODS are reviewed and rated along with regional inservice proposals.

Inservice projects that require contracted service are processed, if budgeted funds remain available, using standard procedures established by DOD, which require approximately 4 months for completion. The funds for contracted services proceed through normal channels in the regions and in ODS and are submitted as a total education package to the Director. Organizational needs are prioritized, matched against existing resources, and held in a pool. Funding for inservice expenditures is designated and released only after all expenses have been met--unanticipated as well as anticipated.

Programs.--DoDDS inservice programs are regulated by DS 2020.1, Inservice Regulation and Manual, published in March 1979. The inservice program includes many types of activities, in most of which teachers engage on a voluntary basis. Typical of the activities are the following, presented in order of highest to lowest frequency within the system:

- o Consultation and workshops held by individual regional curriculum coordinators at local schools, usually at the request of teachers through their principal. (Although the most frequent type of inservice training, this has been seriously limited in recent years by departmentwide restrictions on use of travel funds.)

- o Meetings to write objectives, develop activities, review materials, or evaluate pilot programs, including those within the Five-Year Curriculum Development Plan; held at schools, regional offices, or the central office (ODS).

- o Summer workshops developed in response to needs assessments (particularly as a result of requirements in Public Law 95-561) and led by teachers, regional or ODS coordinators, or contracted consultants.

- o Inservice education of various sorts offered by other teachers at the school or regional level in the discipline in which they specialize.

- o Training in use of a specific program by a publisher's representative.

Special inservice opportunities not sponsored by DoDDS but available to DoDDS educators include the following:

- o Externally sponsored workshops offered in the United States and overseas by agencies such as the National Science Foundation and the National Endowment for the Arts.

- o Coursework offered overseas by U.S. colleges and universities.

- o Host nation training for native educators and others proficient in the language of the host nation.

Inservice needs.--The need for inservice education may be particularly great for professional personnel in the overseas schools because of some of the unusual characteristics of these schools. Teachers are assigned to schools dispersed throughout 20 countries and are isolated from other U.S. educators. They thus have little opportunity to remain abreast of newly developed programs and methodologies. Many teachers serve in relatively small educational communities at a distance from the regional office, and therefore they have few teachers with whom to interact and only infrequently have opportunities to receive regional office support. Often teachers take on new reponsiblities as requested by their respective schools but for which they have had little training. Finally, the establishment of certain certification/recertification requirements in 1979 created an immediate inservice need for a large segment of the teacher population.

A detailed description of inservice needs is contained in the analysis section of this chapter. The most critical needs, which have been identified through a number of assessment methods, concern title XIV programs--i.e., programs for the handicapped, the gifted and talented, those with limited English-speaking ability, those needing compensatory education, and those with an interest in vocational education.

The most recent DoDDS needs assessment (during school year 1980-81) showed that special education, science, reading/language arts, and health/physical education were the areas of greatest need.

Recent actions by DoDDS.--The Inservice Task Group (mentioned previously) was established by DoDDS and met for the first time in January 1980 to coordinate the program for the school system. Its functions include the following:

- To develop unified annual needs-assessment instruments, as described previously.
- To prepare a standard form concerning criteria and procedures and an evaluation plan format for inservice projects requiring DoDDS funding. These are to be used by both ODS and the regional offices.
- To provide support for the inservice component of the 5-year curriculum review cycle.

DoDDS is currently revising DS 2020.1, Inservice Regulation and Manual (March 1979), to include procedures and products established in the first meeting of the Inservice Task Group. The intent of these revisions is to increase participation by individual educators in the process of selecting and delivering inservice education, to project funding requirements more accurately, and to evaluate more effectively the impact of inservice education.

Funding.--Funding estimates for inservice education are based on an estimate that regional staff spend about 50 percent of their time and ODS staff about 4 percent of their time on inservice activities. Actually, in 1979-80, travel restrictions kept many regional coordinators from spending that much of their time on inservice activities.

Table 2 shows approximate funds for inservice education spent during 1979-80 and funds requested for 1980-81. The amount requested for 1979-80 was $2,071,000, which represents approximately .5 percent of the total budget for the school system, whereas the amount requested for 1980-81 represents approximately .9 percent of the total budget.

Table 2. Inservice education funding for school year 1979-80 and 1980-81.

Item	Spent 1979-80	Requested[1] 1980-81
Total	$1,911,000	$3,371,000
Staff salaries (including benefits)	1,291,000	1,537,000
Regions (85 and 101 coordinators @ $30,000 for 50% of their time)	1,275,000	1,515,000
ODS (13 and 18 coordinators @ $30,000 for 4% of their time)	16,000	22,000
Travel[2]	160,000	320,000
Regional	150,000	300,000
ODS	10,000	20,000
Contracted services[3]	460,000	1,514,000
Regional	364,000	1,372,000
ODS	96,000	142,000

[1] Current estimates are that only about 10 to 15 percent of funds requested for travel or contracted services will be available.

[2] Twice this amount was requested.

[3] Largely for summer workshops. Teacher incentives are included.

Pupil Personnel Services

A total of 235 professional staff members, including counselors, psychologists, and social workers, provide guidance, diagnostic assessment support, and liaison with parents and community agencies. The dormitory professional staff administer nine dormitories for 9th- through 12th-grade students whose parents are stationed in isolated locations where DoDDS or other educational facilities are either unavailable or inappropriate. These dormitories are residence units operating on a 5- or 7-day per week basis in conjunction with high schools.

In DoDDS schools the amount of vandalism and delinquency is lower than in most schools in the United States, but students face more often the challenge of moving from school to school. Thus the overseas pupil personnel program has emphasized orientation and pre-exit programs to help students adjust to the frequent change in school situation.

A recent survey indicates that the pupil personnel staff in the field feels that the greatest inservice needs concern children requiring special education, parents of students, and use and interpretation of diagnostic instruments.

During school year 1980-81 the pupil personnel services area has begun an extensive review as part of the cycle of the Five-Year Curriculum Development Plan. A task force composed of regional pupil personnel services coordinators has been working to identify program needs and develop program goals.

Research, Improvement, and Evaluation

Research and improvement activities.--From 1968 to 1979, schools in the European region conducted a Research and Innovative Projects program. Projects funded under this program ranged from studies of outdoor/environmental education to studies of gifted/talented education to development of multiethnic curriculum guides. During the same period, the Pacific region funded projects through its summer projects program.

Currently, two research activities are underway:

- DoDDS is participating in High School and Beyond, a national longitudinal study of 1980 high school seniors and sophomores undertaken by the National Opinion Research Center. A sample of 8,400 students representing each DoDDS high school completed a series of questionnaires focused on the students' high school experiences, plans, and viewpoints on several issues. It is planned to obtain information from the students throughout the period of early adulthood by means of surveys at 2-year intervals of subsamples of students surveyed in the base year. Funding for continuing the project has not yet been approved.

- ED's National Institute of Education and DoDDS cooperatively have developed and funded a project focused on teacher use of testing information that is being carried out by Michigan State University. The purpose is to develop a series of inservice modules for training teachers to make more effective use of test information. The modules are being field-tested in several DoDDS schools before being disseminated to schools across the country.

Evaluation.--Public Law 95-561, title XIV expresses a strong concern for program quality, program evaluation, and dissemination within the system of information about effective programs and practices for adoption by the system. This concern is expressed in the following three ways:

- Section 1405(a) and (b) requires an annual educational assessment by the Director.
- Section 1411 establishes as one of the functions of the Advisory Council on Dependents Education that it "provide information to the Director from other Federal agencies concerned with primary and secondary education with respect to education programs and practices which such agencies have found to be effective and which should be considered for inclusion in the defense dependents' education."
- Section 1412 both requires that a major study of the system be made and also authorizes the Director to "provide for additional studies of the defense dependents' education system to be conducted in accordance with the provisions of this section, but such studies shall not be conducted more frequently than once a year."

DoDDS currently conducts a pupil assessment program and program evaluation in connection with the Five-Year Curriculum Development Plan. The pupil assessment program consists essentially of three activities--the Basic Skills Assessment Program (BSAP), the Metropolitan Readiness Tests (Level II), and the College Entrance Examination Board's Admissions Testing Program. (Results of these activities are discussed under Student Performance in the analysis section.) Program evaluation consists of two major activities--evaluation done under the Five-Year Curriculum Development Plan and the accreditation process by the North Central Association of Colleges and Schools (NCA). Also, a one-time assessment was conducted of student writing and reading/literature skills for program evaluation purposes.

The Basic Skills Assessment Program (BSAP) aims to (1) describe individual pupil strengths and weaknesses in the basic skills in relation to achievement of specific skills within an empirically determined curriculum sequence, (2) identify curricular strengths and areas for program improvement, and (3) obtain a description of pupil performance in basic skills for the entire system.

DS Regulation 2000.6 (January 18, 1979), which establishes the policy and administrative structure for the pupil assessment program, states that (1) an annual assessment of achievement in reading, language arts, and mathematics shall be administered to all pupils enrolled in specified primary, elementary, and secondary grades; (2) an annual school readiness assessment shall be administered to all pupils entering grade 1; (3) the individual pupil results of the assessments shall be reported to the pupils, their parents, and their classroom teachers and shall become part of the pupil's permanent academic record; and (4) the summary results of group performance for each of the assessments shall be made available to the professional educators of the dependents school system and to members of the Congress.

The BSAP is a sophisticated testing program designed to meet the needs of the DoDDS system. It is based on the skills sequence developed for each subject by the Five-Year Curriculum Development Plan, with test items drawn from an item bank maintained by the Los Angeles County Test Development Center. In spring 1980, basic skills tests in reading and language arts were administered to all pupils in grades 3, 4, 6, 9, and 11, and in mathematics to all pupils in grades 3, 5, 7, and 11 (a total of 65,018 pupils). An evaluation of the testing program, with emphasis on use of the test results, is planned for spring 1981, and tests will be administered again in fall 1981 based upon recommendations of the Curriculum Development Committee.

The Metropolitan Readiness Tests (Level II), designed by the Psychological Corporation, are administered to all grade 1 pupils in fall each year (a total of 8,368 pupils in 1980). The broad skill areas assessed are auditory, visual, language, and quantitative. Teachers handscore the tests so that the results may be used for immediate instructional planning. In addition, test booklets are machine scored to produce school, regional, and systemwide results.

The Admissions Testing Program, sponsored by the College Entrance Examination Board, is composed of the following:

- The Scholastic Aptitude Test (SAT), which attempts to determine student verbal and mathematical ability.
- The Test of Standard Written English (TSWE), which determines student ability to recognize appropriate standard English in written material.
- The Student Descriptive Questionnaire (SDQ), which gathers academic and background information from a student.
- Achievement tests in 15 subject areas taken at the option of the student.

In the Five-Year Curriculum Development Plan, a comprehensive evaluation of the curriculum or support services area occurs during the fifth year of the cycle. The comprehensive evaluation focuses both on the program's impact on pupil achievement and attitudes and also on the description of the curriculum and teaching practices associated with the program.

A one-time-only assessment of student writing and reading/literature skills was conducted by the Education Commission of the States. Data on writing skills were collected over a 2-year period. The purposes of the study were (1) to examine the writing abilities of 9-, 13-, and 17-year-olds enrolled in DoDDS; (2) to compare their writing abilities to those of students in other U.S. schools; and (3) to survey the reading abilities of 9-, 13-, and 17-year-old DoDDS students. Data were compiled as a measure of the overall program rather than of individual student performance.

Program evaluation is a part of the accreditation process of the DoDDS schools by the North Central Association of Colleges and Schools (NCA). Before the accreditation team's visit to a school, the principal and faculty conduct a self-study. The accreditation process is more fully described earlier in this chapter.

Data base.--Effective evaluation and improvement activities depend heavily upon adequate information concerning the school system--enrollments, staff, programs, and costs systemwide and by school and region. In September and February of each year, the DoDDS Education Division collects information for a report of programs per school, student enrollment, and number of staff per program. In September, December, March, and June of each year the regional directors submit the Quarterly Management Report to the Director of ODS. This regional report contains the number of personnel in various positions and the number of students per grade per department. Data from these two sources, however, are incompatible. (More information concerning the Quarterly Management Report is given in chapter VI.)

Reporting.--The results of the Basic Skills Assessment Program and the Metropolitan Readiness Tests are compiled annually and distributed to parents and teachers. Results of program evaluations conducted as part of the Five-Year Curriculum Development Plan are distributed throughout the system.

Administration.--The DoDDS system has recently created an evaluation branch in Washington consisting of a branch chief and three evaluators. Three of the regions have two evaluators, and three have one. One of the regional evaluators is solely responsible for NCA accreditation. This organizational structure has developed over the past 18 months.

Cost.--The total amount of money spent in FY 1980 on research and improvement activities was $22,000. Evaluation costs totaled $511,000, with pupil assessments costing $187,000 and program evaluation costing $324,000. For NCA accreditation $174,034 was spent by ODS. This does not include temporary duty (TDY) costs borne by the regions.

DoDDS plans.--The following research activities are planned:

- A study of the impact of the Five-Year Curriculum Development Plan.
- A study of the impact of evaluation data on decision-making and policy formulation in the overseas schools.

Comprehensive program evaluations are planned in compensatory education, special education, language arts, and early childhood education.

To date, the major study of the school system mandated in title XIV of Public Law 95-561 has not been initiated.

Title XIV Programs

Compensatory Education

The purpose of the DoDDS compensatory education program is to meet the needs of students working significantly below grade level in basic skills because of their cultural circumstances, their linguistic isolation, or other environmental causes.

The program began in June 1979, when short-term projects developed by individual schools were funded and a compensatory education coordinator was hired in ODS and in each of the regions.

Students.--The number of students in the overseas system requiring compensatory education has not yet been determined. However, a 5-year systemwide assessment of needs, beginning with the lower grades, has been initiated and has thus far identified 7,849 students in grades 1 and 2, which represent about 23 percent of the total enrollment of about 33,840 in those grades. If this percentage is applied to the higher grades, the number of students in the overseas system requiring compensatory education in school year 1982 would be over 30,500 (using the projected enrollment figure for that year of 133,000). However, if the 1976 estimate of 17 percent as the proportion of stateside students requiring compensatory education is applied to the overseas schools population, the number requiring compensatory education in 1982 would only be about 22,600. Therefore, a reasonable estimate of the potential compensatory education population in DoDDS for school year 1982 is approximately 22,600 to 34,500.

DoDDS reports that for school year 1980-81 approximately 4,100 students are being served in 63 special projects developed by classroom teachers, aides, and volunteers, many of whom have regular assignments apart from compensatory education. Currently, the amount of compensatory education offered in the schools depends to a large extent on the concern of the staff and parents in the individual schools. DoDDS has estimated that assistance for school year 1981-82 in compensatory education programs will be given to about 5,250 students, or only 23.2 percent of the minimal estimate of 22,600 requiring such programs.

Teachers.--In school years 1979-80 and 1980-81, the number of teachers designated as compensatory education teachers totaled 30 and the number of paraprofessionals (usually hired locally) totaled 66. These numbers are misleading, however, since the majority of these teachers work in English-as-a-second-language programs as well, and in many sites the reading specialist, the guidance counselor, an interested classroom teacher, or a volunteer is responsible for the compensatory education program. By region and fiscal year, ODS designated the compensatory education staff positions as follows:

	FY 1980		FY 1981	
	Teachers	Paraprofessionals	Teachers	Paraprofessionals
Total	20	24	10	42
Atlantic	2	1	2	5
Germany North	4	8	2	14
Germany South	4	7	2	11
Mediterranean	4	3	2	5
Pacific	6	5	2	7
Panama	*	-	-	-

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*Staff will be designated for the Panama region in FY 1982.

For the 4,100 students being served in the compensatory education program, the gross pupil/teacher ratio is 137:1. Obviously, actual classroom PTR's vary according to the number of students, teachers, and classes in local schools.

Program development.--The compensatory education program began in June 1979. Regions were required to submit projects to provide additional services for students achieving well below grade level. Although 87 projects were submitted and approved, some were never implemented, while others did not survive beyond the first year. In October 1979, a 3-week training program was provided for newly appointed regional compensatory education coordinators. Subsequently, a 5-year plan was adopted to conduct a systemwide assessment of students in kindergarten through grade 8 in order to identify those in need of compensatory education, beginning with the lower grades. In November and December of that year, a further inservice training effort was made by sending two-member teams from a U.S. university to each of the regions to develop an awareness of the nature of compensatory education and techniques used to identify students needing it.

In 1980, the Curriculum Development Committee established a target school concept to concentrate the limited manpower resources in the schools with the greatest need and decided to provide a compensatory education program through grade 12.

Present plans call for administering basic skills tests in fall 1981 that will lead to selecting target schools. Inservice training and program development are to follow. This plan superseded the previous one to assess the needs over a 5-year period.

Programs.--Currently, various kinds of programs are in use in DoDDS schools, including tutorial (in which older children sometimes tutor younger children), pull-out (in which children or volunteers usually work in a class other than their regular one for a certain period), summer school, and reading laboratory. As stated previously, most of the personnel conducting these projects also have regular assignments.

Funding.--Budget appropriations for 1979 and 1980 and estimated appropriations for 1981 were $2,016,000, $1,586,000, and $1,321,000, respectively. This last amount is expected to support manpower requirements only, leaving schools unable to purchase materials or equipment to implement the programs. In 1980, per pupil expenditure was about $387.

DoDDS plans.--In addition to those activities summarized in the discussion of the program relating to establishing target schools, the following activities are planned for the near future:

- Publication of a compensatory education guide providing guidelines, suggested procedures, and criteria for admission to the program. The guide emphasizes parent and community involvement, inservice education, and evaluation.
- Establishment of a monitoring program to evaluate the target schools. A monitoring team will visit target schools annually during the first 2 years of the program and every 2 years after the first year of program operation. A monitoring team will consist of the ODS compensatory education coordinator and any of the following: The regional compensatory education coordinator; a curriculum coordinator in math, reading, or language arts; the regional evaluation coordinator; and an ODS evaluation coordinator. The team will focus on program development, design and implementation, availability of curriculum materials, pupil assessment procedures, achievement and exiting criteria, and pupil teacher relationships.

Education for the Gifted/Talented

The purpose of the program for the gifted/talented is to provide differentiated education for those students who are identified by professionally qualified persons as capable of high performance because of general intellectual ability, specific academic aptitude, creative or productive thinking, leadership ability, talent in the visual or performing arts, and/or psychomotor ability.

Legislative background.--Public Law 95-561, title XIV, as stated earlier, specifies the gifted/talented as one of the groups whose special needs should be met by programs of the overseas dependents schools. The same act, in another title--title IX, termed the Gifted/Talented Children's Education Act--mentions in section 906(c) the overseas school programs as one of three types to receive not more than 1 percent of the amounts available when the appropriation equals or exceeds $15 million. The purpose of the act is to assist in the planning, development, operation, and improvement of programs designed to meet the special educational needs of gifted/talented children at the preschool, elementary, or secondary school levels. Because the appropriation has never exceeded $15 million, the overseas schools have not had the opportunity to request funding under title IX.

Students.--DoDDS has identified 2,452 children requiring an educational program designed for gifted/talented children. This figure represents 1.5 percent of the total DoDDS enrollment. The regional breakdown shows that only 35 children have been identified in the Mediterranean versus 1,040 in Germany South. The variance in numbers, even given the larger base population in Germany South, is most likely a result of differing criteria for identification. ED's Office of Gifted/Talented estimates that between 3 and 5 percent of the school-age population in the United States is gifted/talented. Because the student population of the overseas dependents schools does not include the lower end of the U.S. socioeconomic continuum and DoDDS students consistently score above the national average on the Scholastic Aptitude Test, 4 percent of the DoDDS enrollment (or 5,320 students in school year 1981-82) appears to be a conservative estimate of the gifted/talented students in the system.

Teachers.--At the present time, DoDDS has nine teachers of gifted/talented students in the following locations: Taegu, Korea; Clark Air Force Base, Philippines; Keflavick Air Force Base, Iceland; Torrejon Air Force Base, Spain; Upper Heyford, England; Stuttgart, West Germany; and Wiesbaden, West Germany. According to experts in the field, a minimum program for gifted/talented would have a 100:1 pupil/teacher ratio with teachers serving as itinerants, and a maximum program would have a 25:1 ratio with teachers providing direct service to each student for at least 7 hours per week. The DoDDS system ratio is about 272:1 for the number identified, but in the two Germany regions it is much higher because they enroll 75 percent of the students while having only 2/9--about 22 percent--of the teachers.

DoDDS selection requirements for teachers include experience in teaching the gifted/talented and 18 semester hours in related courses.

Program.--DoDDS prepared a "Plan for Gifted/Talented Students in DoDDS" in June 1979 that defines the gifted/talented much as the term is defined in Federal legislation, outlines minimum assessment procedures, and describes initial steps for implementing a program (available in "Gifted/Talented Task Force Report"). Further guidance is in several documents that describe special education in DoDDS--DS Regulation 2500.2, DS Administrative Instruction 2500.3, and DS Manual 2500.4. Of particular note is the requirement that an Individualized Education Program (IEP) be developed for gifted/talented children. DoDDS, along with approximately 27 States, has included gifted/talented students under the rubric of exceptional children, extending in its written guidance some of the same protection of programing to gifted students as it has to handicapped students. However, Federal legislation for the handicapped and for the gifted/talented remains in the form of separate statutes.

The nine teachers in the program have established demonstration classes, and in some instances they have been able to provide consulting services to other teachers within their respective regions. Gifted/talented children have access to a variety of creative learning situations, including music seminars and courses in cinematography.

Funding.--The costs of the gifted/talented program in DoDDS are embedded in the overall cost estimates for special education, but there appears to be little money spent on the program except for the salaries and benefits of the nine teachers. The cost of a minimum program for DoDDS, 44 additional personnel spaces, administrative staff, supplies, equipment, and temporary duty (TDY) costs is estimated at $2,215,000. Inservice education for classroom teachers would require additional money.

DoDDS plans.--During summer 1981, DoDDS is planning to develop a systemwide guide for teaching the gifted/talented, and during school year 1981-82 an additional 24 specialists in the field are scheduled to be hired.

Education for the Handicapped

Legislative background.--In 1975 the Education for All Handicapped Children Act (Public Law 94-142) amended the Education of the Handicapped Act, part B, thereby committing the United States to providing a "free appropriate public education" to all handicapped children. Public Law 94-142 may be said to have four major purposes: To guarantee that special education programing is available to handicapped children; to assure fairness and appropriateness concerning special education programs for handicapped children; to establish clear management and auditing requirements and procedures regarding special education at all levels of government; and to financially assist special education efforts of State and local governments with Federal funds. Although Public Law 94-142 did not apply to the overseas schools when it was passed, Public Law 95-561, title XIV, section 1409(c) states that "the provisions of the Education for All Handicapped Children Act of 1975 shall apply with respect to all schools operated by the Department of Defense under this Act." This single statement, followed by no elaboration on its application to the overseas schools, leaves a number of issues unclear. Public Law 94-142 is essentially a State entitlement grant program, with flow-through local education agency (LEA) entitlements, and Public Law 95-561, section 1409(c) neither provides that the overseas schools be considered a State or LEA for the purpose of receiving funding under Public Law 94-142 nor does it redefine the system as an LEA for purposes of the act.

A further impediment to funding under Public Law 94-142 is the augmentation of appropriation doctrine derived from 31 U.S.C. 628, which states that the transfer of funds appropriated by one Federal department to a program in another department is prohibited unless legislation describing the program specifically mentions another Federal department or agency. In contrast, Public Law 94-142, section 611(f) does specifically provide for 1 percent of the funds appropriated under the act to be available to the Department of the Interior for Bureau of Indian Affairs schools but does not provide for the DOD overseas schools.

A review of the legislative history of Public Laws 95-561 and 96-88 shows no specific mention of Public Law 94-142. There is only a reference to the handicapped population among references to other "special" populations, stating that the Secretary of ED should make strong efforts to encourage the participation of DOD schools in services for educating handicapped children (Senate Report No. 96-49), and a statement that the overseas schools should be allowed, as a result of the transfer to ED, to participate in a wide range of education programs not open to them under DOD.

Because there are no legislative guidance and mechanisms for the overseas schools regarding compliance with Public Law 94-142, the statutory language of the act itself must serve as a standard of performance. The act requires a State, in order to receive funds, to submit a 3-year plan and comply with that plan and various other regulations. The State plan must contain certain information and assurances. The central requirement for implementing Public Law 94-142 is the assurance that all handicapped children in the State will be provided (within statutory mandated age ranges and time lines) a free appropriate public education. In addition, the plan must contain detailed policies and procedures that the State will undertake (or has undertaken) to ensure that it has a goal of providing full educational opportunities to all handicapped children.

Specifically, the plan must address the following eight program areas:

- Identification, location, and evaluation of all handicapped children
- Confidentiality of personally identifiable information
- Implementation of Individualized Education Programs (IEP's)
- Least restrictive environment
- Provision of related services
- Comprehensive system of personnel development
- Private schools
- Procedural safeguards

Public Law 94-142 and the implementing regulations also discuss the requirement that a State establish an advisory panel on the education of handicapped children. (A State plan also must contain certain other statutory and regulatory requirements, information, and assurances regarding monitoring, State responsibilities, control of funds, fiscal matters, and appeals procedures.)

The DoDDS program in relation to State requirements.--Estimating accurately the number of handicapped children attending DoDDS schools--and therefore programing resources effectively--has been problematic. Not only is there no completed census of handicapped children, but DOD overseas assignments policies affect the composition of the handicapped population overseas, thus making predictions based on national averages or on comparable school districts difficult. The military services have policies, backed by regulations, that evaluate families for overseas assignment. If an armed service member has a handicapped dependent, it is possible that he or she may not be cleared for overseas assignment or may be required to accept an unaccompanied tour. Then, if the overseas assignment is approved, efforts are made to locate the family in an area where appropriate educational and medical services are available.

Nevertheless, DoDDS estimates that roughly 10 percent of overseas dependent children aged 3 to 21 require special education services. This translates into an estimate of 13,300 students in FY 1982. (This estimate is based on a report to the Congress by the Office of Special Education and Rehabilitative Services--OSERS--estimating that about 9.5 percent of the population aged 3 to 21 years are receiving services for the handicapped and that 12 percent require it.) The 10 percent estimate for DoDDS seems reasonable, since it includes a projection for unserved children as well as anticipating that more annual service members with handicapped dependents will be assigned overseas if services are available.

Currently there are 321 special education teachers and 170 paraprofessionals serving the special education population. The FY 1981 DoDDS request would increase support to the special education program to about $20.4 million.

In the absence of a specific statutory determination to treat the overseas schools as a State for the purposes of Public Law 94-142, no State plan as such is required. Present guidance developed within the DoDDS system consists of DS (Dependents Schools) Regulation 2500.2, Department of Defense Dependents Schools "Special Education Programs and Services for Exceptional Students," and the related DS Administrative Instruction 2500.3, May 25, 1979. These provide brief, general program definitions, outline referral procedures, and describe the responsibilities of the Office of Dependents Schools (ODS) Director and of the DoDDS regional directors. Program operating instructions are contained in DS Manual 2500.4, Program Guide for Exceptional Children and Youth (available in "Education for the Handicapped Task Force Report"). The DOD Office of the General Counsel has agreed to work with other components of the Department in formulating regulations with respect to the application of Public Law 94-142 to DoDDS.

The overseas dependents schools are not required to prepare a plan as are States. Although no comparable planning mechanism has been developed by DoDDS, some comparisons may be made between the program requirements of the State plan and the program activities in the overseas schools.

- Identification, location, and evaluation: In fall 1980, DoDDS conducted a partial child count. The six regional offices were requested to identify those children needing special education services and to categorize the children according to their progress from referral for services to development of an IEP. The data were confounded by varying regional definitions of handicapping conditions and the inclusion of limited-English-speaking children and compensatory education services. To date, the data received have not been collated. No information on racial background, sex, age, or other relevant data has been collected concerning special education students.

- Confidentiality: The subject of confidentiality is treated briefly in section 5 of DS Manual 2050.1, "Student Rights and Responsibility," published in 1975. The section describes confidentiality in those procedures related to access and release of student records.

- Individualized Education Programs: DS Manual 2500.4, Program Guide for Exceptional Children and Youth, describes the content of the IEP, assigns responsibility for its development, and outlines the procedures to be followed in writing the IEP. To date there has been limited regional or systemwide monitoring of the use or effectiveness of the IEP process.

- **Private schools**: DOD has provided no regulatory guidance for placing handicapped children in private schools. In the DoDDS overseas situation, private schools able to provide an appropriate special education program are not readily available, and it is unclear where responsibility resides for private school placement in the United States--i.e., with DoDDS or with the home State of the armed service member or with parents. (The nature and extent of DoDDS responsibilities regarding private school placement are currently being litigated.)

- **Procedural safeguards**: DS Manual 2500.4 in supplement #2 contains procedures to be followed by the overseas schools and parents if they disagree on the evaluation and placement of students in special education programs. The supplement states that the parent has a right to examine all relevant records, and it details steps to be followed in conducting a hearing. Sample forms are provided for school and parent use in initiating hearings. Though the manual suggests using judge advocate's staff as hearing officers, the method of designating persons to serve in this capacity remains unresolved. The DOD General Counsel has been developing regulations with DoDDS governing hearing procedures. There has been little internal monitoring of the effectiveness of hearing procedures currently in place.

- **Least restrictive environment**: The provision concerning the least restrictive environment requires that, to the maximum extent appropriate, handicapped children are to be educated with children who are not handicapped, with removal of handicapped children from the regular education environment (as in special classes or separate schools) to occur only when education in regular classes with supplementary aids cannot be achieved satisfactorily. The school system is also required to provide a continuum of alternative placements as a mechanism for ensuring education in the least restrictive environment. D.S. Manual 2500.4 defines least restrictive environment in terms consistent with Public Law 94-142 and makes a commitment to educate children in such an environment. Difficulty has been experienced in overseas schools serving small or medium-sized isolated populations. The full range of possible educational environments exists only in the larger population centers. Many small and medium-sized schools have minimal or no help available to students requiring special education. The decision concerning the "least restrictive environment" for a handicapped child is often determined by the area to which a child's sponsor is assigned rather than by the child's instructional needs.

  The DoDDS system presently provides a continuum of services ranging from a special day school to consultant services given by a resource teacher, with paraprofessionals working in conjunction with most special education teachers, but it is clearly not feasible to provide on site all types of services at all locations at all times. Itinerant instructional services are minimal and difficult to document. Itinerant diagnostic services are also minimal.

- Related services: The Education of the Handicapped Act, as amended by Public Law 94-142, section 602(17), defines related services as those additional services necessary in order for a child to benefit from special education--specifically, "transportation, and developmental, corrective and other supportive services (including speech pathology and audiology, psychological services, physical and occupational therapy, recreation and medical and counseling services, except that such medical services shall be for diagnostic and evaluation purposes only)." Costs for related services are to be borne not only by State and local education agencies but by other public agencies as well.

  The area of related services presents some problems for the overseas schools. The military services are the only agencies operating overseas (other than the schools) that are capable of providing related services, and they are not presently staffed or directed to provide related services on the scale needed by handicapped dependent children in the overseas schools. Transportation is provided by the services on a reimbursable basis (see chapter V). The overseas schools provide some speech therapy and psychological and counseling services, but they are understaffed, with only 246 counselors, 12 social workers, 20 psychologists, and 129 nurses to serve 136,000 students. The military services provide some speech therapy, audiology, and physical and occupational therapy as well as medical services. However, the active duty military members receive first priority for such services, and the capability to meet the total demand of military personnel and dependents, including handicapped children, is limited in many overseas locations.

- Comprehensive system of personnel development: Section 613(a)(3) of the legislation calls for developing and implementing a comprehensive personnel development system based on a continual assessment of the need and competencies of persons necessary to carry out the requirements of the act. Preservice as well as inservice needs must be determined for various persons, including regular and special education personnel.

  Beginning in school year 1978-79, inservice training for special educators, regular educators, and parents was conducted in each DoDDS region and continued throughout school year 1979-80. Sessions have been conducted by a consortium of colleges and universities

> that provide credit to participants. Interviews with teachers and principals indicate that they would like to see the training improved and extended. DoDDS principals and regional administrators still have not been adequately informed of the requirements of Public Law 94-142 and their specific responsibilities for implementing the act within the system. Teachers feel that the training was too general, not addressing specific areas of concern for the system and classroom teachers. A comprehensive plan of personnel development written in consultation with all interested groups is not available at present.

Concerning the requirement for an advisory panel, an initial meeting was held in August 1980 with participation from various groups interested in permanent membership, and the charter establishing the Advisory Council was approved by the Secretary of Defense. (See appendix D.)

Costs.--Studies conducted over the past decade show that the average cost of educating a handicapped child is twice a school system's per pupil cost for the regular program, averaging over the total range of special education services. The per pupil cost in DoDDS is estimated at approximately $3,305 for the regular program in 1982, and thus the excess cost for the handicapped would be $3,305. With an estimated 13,300 handicapped students in the system (10 percent of an FY 1982 estimated student population of 133,000), the cost for a fully operating program for the handicapped would be about $44 million. This figure does not include contract costs for related services or private schools.

Pupil-teacher ratio.--The recommended pupil-teacher ratio for handicapped children varies from 6:1 to 40:1, depending on the nature and severity of the handicap. This is consistent with DoDDS staffing criteria, which are 8 or 10:1 for severely handicapped children and 25:1 for mildly handicapped children. These criteria have been used by school systems in the United States that have been found in compliance with Public Law 94-142. It is estimated that of the 13,300 handicapped students projected for FY 1982, about 10 percent (or 1,330) are severely handicapped and about 90 percent (or 11,970) are mildly handicapped. Thus, using DoDDS criteria, a total of 612 teachers would be required, or 311 more than the present 301 staff reported as of September 1980. Additional paraprofessionals and administrative personnel are also needed, for an estimated total increase of 446 staff (including teachers).

Recent DoDDS actions.--The following is a summary of recent actions by DoDDS to implement its program for educating handicapped dependents attending school in the overseas schools:

- August 25, 1978: Established a full-time special education position at the DoDDS headquarters office.
- October 1978: Convened a special education task group at DoDDS headquarters office.

- October 1978: Established staffing needs and funding requirements for strengthening special education services.
- January-March 1979: Made a complete review of all materials being used in special education programs in DoDDS and new materials available from publishers.
- May 1979: Revised regulations and administrative instruction implementing procedures for compliance with Public Law 94-142.
- July 1979: Revised Program Guide for Exceptional Children and Youth, a procedural guide for implementing Public Law 94-142.
- September-October 1979: Established in each regional office a full-time special education coordinator position.
- September-October 1979: Hired 79 additional professional special education staff and 120 paraprofessionals to assist new and established programs in special education.
- October 1979: Authorized $923,000 for purchasing supplies and materials for special education.
- October 1979: Authorized $350,000 for inservice training of staff in order to ensure understanding of the requirements of Public Law 94-142.
- December 1979: Implemented child find activities in all regions. Data were incomplete and a final report was not compiled.
- January 1980: Opened additional preschool handicapped centers in Stuttgart and Nuernberg, Germany; Clark Air Force Base, Philippines; Lakenheath, England; and Kadena, Okinawa.
- April 1980: Implemented screening procedures for identifying preschool handicapped children in Iceland and Torrejon, Spain.
- January-June 1980: Initiated a needs assessment (child count) of the entire DoDDS system to determine the specific number of handicapped children being served and of those requiring additional assistance. Data were incomplete and a final report was not compiled.
- January-present: Worked with experts from the Office of Special Education and Rehabilitative Services (OSERS) in developing a compliance guideline to assist schools in complying with Public Law 94-142. The draft was given to DOD General Counsel for use in preparing comprehensive regulations.

- August 1980: Held the first meeting of the Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents.

- In progress: Developing under contract a preschool handicapped program guide for use in the field.

- In progress: Developing a multimedia training program for hearing officers.

In summary, since August 1978 DoDDS has increased special education staff at the local, regional, and headquarters levels. As part of the Five-Year Curriculum Development Plan cycle, materials were reviewed and purchased, inservice training activities were conducted, and written guidance was revised. In addition, an advisory panel on the handicapped was convened, child find and child count activities were initiated, and draft compliance guidelines were developed.

Education for Individuals of Limited English-Speaking Ability

The purpose of the DoDDS program for limited English-speaking (LES) students is to increase the English-language proficiency of students whose ability to use the language has not developed to a level that allows them to participate fully in and thus benefit from an education program that uses English as its medium of instruction. The program is designed for students with limited English-speaking ability from homes where more than one language is spoken.

On May 22, 1977, DoDDS published DS Manual 2440.1, which is described in its preface as "a broad general statement of the overall English as a second language (ESL) component of the Department of Defense Dependents Schools Transitional Bilingual Education Program." The report then states that "the Transitional Bilingual Education Program includes the following:

a. English as a second language classes as a component

b. Use of the other or dominant language as a medium of instruction

c. Courses about the culture and history of the United States plus the other country."

Presently, only English-as-a-second-language is operating in DoDDS, although component "b" could be used where there is a high concentration of children speaking the same foreign language.

Program.--A systemwide program for LES students is not presently planned and coordinated. Programs are individually planned by the schools or by the regions and thus vary considerably. In general, LES students are scheduled to receive ESL instruction 20 to 150 minutes each school day or twice a week. Each program is supposed to respond to cultural as well as linguistic needs of students with limited English-speaking ability.

Organization and planning.--The first attempt by DoDDS to identify the requirements necessary to establish a program for LES students was a systemwide count of bilingual students and of students with limited English-speaking ability in school year 1976-77. Despite various limitations, this survey clearly indicated the need to give the program greater attention. In May 1979, after title XIV listed individuals of limited English-speaking ability as a group for whom a program should be implemented in the overseas schools, DoDDS published a general manual stating the purposes and objectives for the program, and during 2 weeks of the summers of 1979 and 1980 over 70 DoDDS teachers were given 6 hours of intensive college-level courses in the United States in the theory of language and methods of teaching ESL. Also, DoDDS assigned the responsibility of coordinating the ESL programs to the language arts coordinators throughout the system (with the exception of the Panama region, for which the reading coordinator has responsibility).

Although no systemwide plan for the program for LES students has as yet been developed by DoDDS, the central headquarters recently reported initiating work to develop systematic program guidelines for planning and implementing the program. Input is to be made by the Curriculum Development Committee in an upcoming meeting in Washington, D.C., followed by inservice training in the regions in the use of the guidelines.

Students.--The best estimate of the proportion of DoDDS students with limited English-speaking proficiency is about 6 percent. This estimate is based on a 1977 DoDDS census survey that shows that about 9 percent of the total student population come from homes where two or more languages are spoken, and from the experience of U.S. State education agencies, which report that about 2/3 of students identified as speaking two or more languages are usually limited in English-speaking ability. In the case of DoDDS, the estimated number of students with limited English-speaking ability in school year 1981-82 will be about 8,000 (2/3 of 9 percent x 133,000 students--i.e., 6 percent of the enrollment).

The 6 percent systemwide estimate is supported by a September 1980 DoDDS survey conducted in the Pacific region that showed that 8.4 percent of the students in that region had limited English-speaking ability. Observation has indicated that the Pacific and Panama regions have a higher proportion than other regions of students from homes in which a language other than English is spoken, and therefore one would anticipate a higher proportion of students with limited English-speaking ability from those two regions as compared to the DoDDS system as a whole. The higher than average 8.4 percent figure for the Pacific is consistent with this thinking and supports the 6 percent figure as a reasonable estimate of the percent of DoDDS students with limited English-speaking ability.

In most DoDDS schools with children who speak a language other than English, there are not large concentrations who speak the same foreign language. Some schools in the Pacific and Panama regions are the principal exceptions. However, because both groups of students can be found in the system (i.e., groups speaking the same foreign language and groups speaking a number of foreign languages), there are several conceivable options for developing programs for limited English-speaking students, including English-as-a-second-language and transitional bilingual education.

No data are available by grade level, race, or sex, nor is there any indication of achievement level of ESL students in regular classes or of drop-out rates of LES students. Standards for student identification, placement, or exit from programs have not been established.

Teachers.--No firm data are available on the number of staff teaching LES students. Exact numbers are difficult to determine because some ESL teachers' primary responsibility is in another discipline such as reading, speech and hearing therapy, foreign languages, or language arts. DoDDS did request a staffing/enrollment report by region and school level for ESL for school year 1980-81, but the results were too incomplete to give reliable data. Another attempt is being made. It is reported, however, that DoDDS has at least 20 qualified ESL teachers, having reassigned 8 from other programs in the DoDDS schools when the program began in school year 1976-77 and recruited another 12 from the United States in school year 1978-79. Data are not available on certified bilingual teachers.

DoDDS has, however, established qualifications for ESL teachers within the system. In addition to being qualified in one other teaching category, an ESL teacher must have 15 semester hours in courses such an linguistics, social linguistics, comparative culture, language development, and social psychology of the bilingual child. Course work must include at least 6 graduate semester hours in the theory and practice of teaching English-as-a-second-language. Further, 1 year of ESL teaching experience at the school level for which the teacher is applying and a teaching certificate in any subject area are required. Qualification standards for bilingual teachers have not been established.

DoDDS criteria for pupil/teacher ratio is 20:1 for grades 1 through 6 and 50:1 for grades 7 through 12. With about 2/3 of the DoDDS enrollment in the lower grades and an estimated LES population of about 8,000, at least 266 teachers would be required for the lower grades and 53 for the upper, to make a total of 319 staff positions for LES students. Since the estimate of LES students is probably low, the estimate of ESL staff required is also probably low.

Funding.--ODS estimates that it needs a minimum increase of 257 personnel to meet the needs of LES students by FY 1985 (to make a total of about 277 staff positions, rather than the

319 suggested in the preceding paragraph by general, systemwide data). The total annual cost for LES instruction by FY 1985, based on current costs, would amount to $13.5 million, broken down as follows:

7 coordinators (planned for school year 1981-82)	$ 290,336
20 teachers (from school years 1976-77 and 1978-79)	760,000
40 teachers (planned for school year 1981-82)	1,520,000
210 teachers (planned for phasing in by school year 1982-83)	7,980,000
Supplies and equipment	2,500,000
Inservice training	500,000
Total	$ 13,550,336

For FY 1981, a total of about $1,034,000 was requested--including $232,000 for new staff positions and $800,000 for a census survey of LES students and for providing inservice for teachers of LES students. (This does not include salaries for on-board staff working in ESL, which is subsumed in the regular DoDDS budget.) The amount allocated, however, was only $39,000, which was used for travel and inservice training for ESL teachers, ESL contracts, and expenses related to ESL task group meetings.

DoDDS plans.--Plans for the program for LES students include the following:

- Inservice training of 3 or 4 days in school year 1980-81 for all regions by two headquarters personnel (the coordinator of the program for LES students and one of the evaluation coordinators). The training will include information on instruments and procedures available to identify LES students, on methods for assessing the proficiency of bilingual students in the language spoken, on services available for LES students, and on exit criteria. It is also proposed that the same inservice training be presented to administrators at the next annual DoDDS administrators meeting.
- Meetings of the coordinators of the program for LES students to plan curriculum development activities, evaluation and assessment of student performance, and program goals; and to monitor inservice activities.
- Purchase of instructional materials appropriate for students with varying levels of proficiency in speaking, reading, writing, and understanding English.
- A request for 40 additional full-time qualified teachers for school year 1981-82.
- Establishment of a separate position for the coordinator of the program for LES students at headquarters level.

Vocational/Career Education

Public Law 95-561 requires that the overseas dependents schools provide "programs designed to meet the special needs of individuals with an interest in vocational education." DoDDS has implemented programs under this authority that include both vocational and career education. Presently, the entire program is termed "Career Education" and subsumes vocational education, career awareness education, and education in a broad range of occupations and skills.

Program.--The vocational/career education program in DoDDS is open to all students, including the handicapped and gifted/talented, and both males and females. Students are not tracked into specific programs by grade level such as academic or vocational. The overall program is divided into three programs by grade level: Career awareness for kindergarten through grade 6, career exploration for grades 7 through 9, and career preparation and decisionmaking skills mainly for grades 10 through 12.

The career awareness program (K-6) emphasizes development of a positive self-concept, basic skills, effective work habits, and fair and equal treatment of women and minorities. Resource speakers, field trips, and specific objectives are infused in all disciplines.

The career exploration program (grades 7-9) provides opportunities to explore the various career fields in laboratories in industrial arts, home economics, and business. Several DoDDS middle schools also offer similar training in electricity and small engines.

The career preparation and decisionmaking skills program (primarily for grades 10-12) offers 13 separate programs, most of which include courses in smaller occupational fields. In addition, career education concepts are infused into other courses and an attempt is made to bridge the gap between school and work by courses relating subjects such as math, science, social studies, English, foreign languages, health and physical education, and host nation experiences to skills needed in occupations. The 13 fields are the following:

1. Business education. Offering 28 different courses, the business program is for both college-bound students and those seeking entry-level job skills. Exploratory business courses are offered in grades 7 through 9 and vocational business courses in grades 10 through 12.
2. Cooperative work experience. With the two major facets of exploration and preparation, the cooperative work experience program offers to students 14 to 20 years of age on-the-job training supervised and instructed by military personnel. The military services have excellent training facilities on all the overseas bases and cooperate with this program in training sites such as motor pools, base hospitals, jet engine

shops, civil engineering shops, and recreational facilities. Some junior high schools also offer cooperative work experience.

3. Industrial arts. Laboratory courses include general laboratory and mechanical drawing, each with three major areas. Industrial arts is offered in a few junior high schools also.

4. Home economics. Fundamental and specialization training is provided in five different areas. Home economics is offered at the grade 7 through 9 level only.

5. Cosmetology. Basic cosmetology acquaints students with the technical foundation and manipulative skills, and advanced cosmetology improves those skills, offers related technical knowledge, and provides training and experience leading toward licensing in the United States.

6. Automotive technology. Five courses in automotive technology offer students skills and knowledge from the most general to entry-level.

7. Electricity/electronics. Courses in electricity/electronics vary in length and structure throughout DoDDS, according to location, population, and available facilities.

8. Junior Reserve Officers Training Corps (JROTC). Fourteen high schools offer JROTC programs, which include eight Air Force aerospace education programs and seven Army programs.

9. Computer technology. The business curriculum usually offers computer technology.

10. Graphic arts. Most DoDDS schools offer only selective instruction in the various graphic fields as a part of business, industrial arts, art, or language arts courses. Only four high schools offer a comprehensive program with specialized facilities and equipment.

11. Medical/dental assisting. The dental program includes chairside assistance, laboratory skills, dental records, x-ray techniques, receptionist duties, and office management activities. The medical program includes basic first aid, nursing procedures, artificial respiration, blood pressure/pulse/temperature reading, study of the respiratory and circulatory systems, use and administering of drugs, and legal aspects of patient care.

12. Agriculture/horticulture. The study of basic theories of agriculture and horticulture comprises the academic part of the agriculture/horticulture program. The practical part includes hands-on activities such as raising and marketing saplings.

13. Project discovery. Middle school students explore 25 different career fields in this pilot program.

The availability of programs varies by location. Programs in business and cooperative work experience are the most numerous. The number of courses offered in each program is shown by region for school year 1980-81 in table 3 for the middle/junior high and senior high school levels.

Table 3. Number of DoDDS vocational/career education programs in grades 7-12, by region and school level: 1980-81

Program/level	Atlantic	Germany North	Germany South	Mediterranean	Pacific	Panama	Total
Middle/junior high programs							
Business	7	11	6	2	5	2	33
Industrial arts	6	11	5	6	5	2	35
Home economics	6	11	7	3	5	2	34
Work experience	2	2	0	0	0	0	4
Auto	0	1	0	0	0	0	1
Project discovery	0	0	0	0	2	0	2
Subtotal	21	36	18	11	17	6	109
Senior high schools							
Automotive technology	3	9	6	3	2	2	25
Cosmetology	2	6	6	2	1	0	17
Electricity/electronics	4	5	4	3	5	0	21
Graphics	0	4	2 (combined)	0	0	0	6
Medical/dental assisting	0	1	0	1	0	0	2
JROTC	2	5	4	1	0	2	14
Business	10	13	11	14	11	2	61
Work experience	10	12	11	14	11	0	58
Computer	4	0	0	0	8	2	14
Subtotal	35	55	44	38	38	8	218
Total	56	91	62	49	55	14	327

Students.--Vocational/career education enrollments in grades 7 through 12 totaled 37,470 in school year 1980-81. Table 4 gives enrollments by programs for that school year. Because a student could have enrolled in more than one course, enrollments were probably higher than the number of students taking one or more courses. It is estimated, however, that the percent of total secondary school students in DoDDS who enrolled in vocational/career education courses was between 45 and 60 percent. Because career education concepts are infused into the academic discipline from kindergarten through grade 6, all elementary school students participate in career education.

Teachers.--DoDDS presently employs 474 full-time equivalent (FTE) vocational/career education teachers in grades 7 through 12, or about one-fifth of the total number of teachers in those grades. There are also nine FTE teachers employed to coordinate career education activities at large school complexes. The average pupil-teacher ratio systemwide is 16:1. The number of FTE teachers in each vocational/career program is given by region in table 5. The number of teachers in vocational/career education at present is satisfactory. Although all meet North Central Association certification standards, many lack basic pedagogical training. It is estimated that one in seven of the teachers in the automotive technology, cosmetology, and electricity/electronics programs is deficient in fundamental teaching skills.

Table 4. Enrollments in DoDDS vocational/career education programs in grades 7-12, by region: 1980-81

Program	Atlantic	Germany North	Germany South	Mediterranean	Pacific	Panama	Total
Business	1,400	3,500	3,079	1,320	2,037	630	11,966
Cooperative work experience	500	965	738	406	828	0	3,437
Industrial arts	920	1,920	2,110	1,345	1,164	710	8,169
Home economics	770	1,721	1,721	839	1,074	349	6,474
Cosmetology	138	527	482	164	45	0	1,356
Automotive technology	200	752	501	150	147	144	1,894
Electricity/electronics	220	323	248	144	22	0	957
JROTC	175	500	494	116	0	234	1,519
Computer technology	180	430	0	0	263	133	1,006
Graphic arts	36	266	60	0	232	0	594
Medical/dental assisting	0	10	0	68	0	0	78
Agriculture/horticulture	0	20	0	0	0	0	20
Project discovery	0	0	0	0	90	0	90
Total	4,539	10,934	9,433	4,522	5,902	2,200	37,560

Table 5. Number of teachers in DoDDS vocational/career education programs in grades 7-12, by region: 1980-81 [1]

Program	Atlantic	Germany North	Germany South	Mediterranean	Pacific	Panama	Total
Business	14.5	33	27.5	15	20.5	6	116.5
Cooperative work experience	9.5	10.5	13	10	8	0	51
Industrial arts	11.5	25	21	15.5	17	9	99
Home economics	11.5	21	17.5	12.5	12	5	79.5
Cosmetology	1.5	6	6	2.5	1	0	17
Automotive technology	4	11	6	3	1.5	2	27.5
Electricity/electronics	4.5	4.5	6	2	.5	0	15
JROTC	4	10	3.5	2	0	7	33
Computer technology	4	8	0	0	6.5	2	20.5
Graphics	1	4	0	0	6	0	11
Medical/dental assisting	0	1	0	1	0	0	2
Agriculture/horticulture	0	1	0	0	0	0	1
Project discovery	0	.5	0	0	.5	0	1
Total	66	135.5	104.5	63.5	73.5	31	474

[1] There are, in addition, a total of 9 teachers employed to coordinate career education activities in large school complexes—3 in the Atlantic, 1 in North Germany, and 5 in the Pacific.

Funding.--Exact per pupil and program costs cannot be determined because the DoDDS financial management system does not budget monies or report expenditures by program. Only a portion of the total expenditures on vocational/career education are earmarked as line items and can be traced through internal accounting procedures. These are funds especially earmarked as Five-Year Curriculum Development Plan and title XIV items in the budget. Other expenditures making up the total are the result of discretionary spending from a total regional budget and are not tracked. Still other vocational/career education expenditures, particularly for supplies and equipment, are the result of "fall-out" monies made available at the end of the year.

Programs Under Consideration

Adult Education

Although an adult education program is not presently offered in DoDDS, courses for adults were provided during the 1971-76 period as part of the Predischarge Education Program (PREP). Public Law 91-219, enacted by the Congress in March 1970, provided for congressionally appropriated funds, controlled by the Veterans Administration, for implementing and operating a predischarge education program for eligible servicemen who had no high school diploma or who lacked the necessary academic requirements for entering college or postsecondary educational or vocational programs. Subsequently, PREP programs were sponsored by numerous school districts in the United States as well as by DoDDS.

Adult education courses, supported by PREP funds, were conducted during the 1971-76 period in all three DoDDS geographical regions--Europe, the Pacific, and the Atlantic. Courses and programs could be classified according to (1) completion of high school diploma, (2) basic skills education, (3) remedial training, and (4) refresher/career education. Approximately 5,000 military personnel were enrolled in these courses during each term. The average number of courses taken by a student was two (15 class hours per week), which equaled half of the usual 30-hour load for secondary school students. In October 1976, the PREP program was terminated, and since the DoDDS charter did not permit DoDDS to participate in the programs that replaced PREP (mainly basic skills education programs), DoDDS programs for adults were also terminated. Subsequently, non-Federal education institutions became increasingly involved in providing replacement programs through contracts with the individual armed services.

Preschool Education

Title XIV, section 1402(b)(3) requires the Secretary of Defense to provide a developmental preschool program for overseas dependents who are of preschool age "if a preschool program is not otherwise available for such individuals and if funds for such a program are available."

A developmental preschool program in most U.S. schools is an organized education program for children aged 2-1/2 through 4 years that focuses on social/emotional and intellectual development, readiness skills for entering kindergarten, and developmental skills and successful early experiences in a school setting.

At present DoDDS does not offer a preschool program for dependents overseas. A small number of preschools of uneven quality are available in some communities, but rarely more than one in a location. The military services do provide child care--not a developmental program--that has limited services. Only a portion of the eligible children (about 6-15 percent) are able to participate, because staff and facilities are limited.

It is estimated that the number of eligible children in either the 3-year-old or the 4-year-old group would equal the number of 5-year-olds attending DoDDS kindergartens (currently 14,407).

A feasibility study was conducted over an 8-month period in 1980 by PSI Associates, Inc. to help the Secretary of Defense determine how to respond to the requirement in Public Law 95-561. The study involved extensive data collection and analysis in all six DoDDS regions. It included (1) structured interviews and surveys used with parents, teachers, principals, and regional office staff; (2) classroom observation; and (3) information on community and military programs serving preschool students. Results of that study are summarized and discussed in the analysis section.

SCHOOL EMPLOYEES

Of the 10,904 employees in the DoDDS school system, approximately 99 percent are assigned overseas to the six regional offices and the 270 local schools. Professional employees in the local schools may be categorized as (1) administrators (i.e., principal, assistant principal, etc.); (2) pupil personnel specialists (i.e., guidance counselor, dormitory counselor, school psychologist, social worker); (3) teacher specialists (i.e., in art, music, reading improvement, special education, media); (4) teachers (i.e., regular classroom, physical education, and vocational teachers); and (5) local national teachers (i.e., teachers in the host nation program, etc.). Although some local school administrators also serve as teachers in very small schools, the latter four categories apply directly to DoDDS employees involved with students on a day-to-day basis in providing education programs and services. Information on the number of individuals in each of these categories is not presently available from DoDDS.

About half the system's new teachers are recruited each year from the United States by the Personnel Division in DoDDS headquarters. In accordance with DOD Directive 1400.10 (July 9, 1976), qualified locally available dependent spouses of military or civilian personnel employed by a DOD agency are given priority consideration for teacher positions. After vacant positions are filled by such dependents, the remaining vacancies are reported to the Personnel Division, thus constituting the authority for hiring from the United States. Of the approximately 1,400 teachers appointed in school year 1979-80, about 700 were recruited from the United States. The ODS Personnel Division advertises in the news media, prepares an annual brochure for prospective overseas teachers, screens applications and schedules interviews, selects the best qualified candidates from applicant supply files, and controls overseas requisitions for numbers and categories of educators requested. (Teacher recruitment is discussed more fully in chapter III.)

Requirements for teaching in most positions in the DoDDS system include a baccalaureate degree from an accredited institution, 40 semester hours of study in general education, 18 semester hours of course work in professional teacher education, a valid teaching certificate from a State or State-approved college or university, and 1 year of successful full-time professional employment within the last 5 years in the grade level or subject field(s) for which the person is applying.

Teachers and other staff residing in the United States are employed by the DoDDS system usually with the understanding that they will serve a minimum of 2 school years. All teachers enter for a specific length of time, whereas most others are employed on a permanent basis. Of the 1,512 professional staff leaving DoDDS schools in 1979-80, a total of 508 had served for only 1 year, 1,021 for 3 years or less, and 178 for 10 years or more. Of the 1,512 separations, 605 were teaching staff, of whom 554 had been in service 2 years or less. The separation figures do not include the approximately 600 to 800 teaching and other professional staff that transfer from one school to another within the DoDDS system.

At the present time, DoDDS has not developed a comprehensive profile of the professional qualifications of its school employees. Data on college degrees, non-degree certificates, teacher certification, and teaching experience are not routinely collected, recorded, or analyzed.

However, information on college degrees and non-degree certificates was gathered as an ED addition to a DoDDS "Report of Programs" survey completed by all school principals in September 1980. The survey data do provide some insight into the distribution of educational expertise by content areas and across DoDDS regions, but they do not present a comprehensive or fully accurate professional profile of school employees. Tables 6 and 7 were constructed from these data.

A word of caution is indicated for interpreting these tables. Since only the highest degree was recorded for each school employee, the tables do not necessarily reflect the full range of degree attainment in each of the content areas. An employee with an M.A. degree in Elementary Education, for example, might also hold a B.A. degree in some other area. As the highest degree, only the M.A. in Elementary Education would be accounted for in the tables.

Despite the acknowledged limitations, the tables are useful for gaining some general impressions about the professional preparation of school employees. Some observations based on the tables follow:

- The approximate percentage distribution of DoDDS school employees according to the highest degree or non-degree certificate is as follows: Doctor's, 1.3 percent; master's, 48.7 percent; bachelor's, 47.2 percent; non-degree certificate, 2.8 percent (based on "total column" numbers for these categories in table 6).

Table 6. Number and percentage of total highest degrees/certificates in each DoDDS region: September 1980

Degree/ Certificate[1]	Atlantic		Germany North		Germany South		Mediter-ranean		Pacific		Panama		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
NDC	21	8	123	46	52	20	18	7	50	19	-	0	264	100
BA	399	9	1,418	32	1,123	25	415	10	623	14	440	10	4,418	100
MA	629	14	1,230	27	892	20	584	13	863	19	355	8	4,553	100
DO	17	15	28	24	24	21	11	9	24	21	12	10	116	100
Total[2]	1,066	(11)	2,799	(30)	2,091	(22)	1,028	(11)	1,560	(17)	807	(9)	9,351	(100)
Distribution of student population	—	11	—	33	—	25	—	9	—	16	—	6	—	100

[1] NDC = Non-degree certificate
BA = Bachelor's degree
MA = Master's degree
DO = Doctor's degree
Total = Total degrees/certificates

[2] Total may include more than one highest degree for a school employee and does not include some 332 "unknowns" for total DoDDS.

- The distribution of highest degrees/certificates by DoDDS regions is fairly consistent with the general distribution of student population by regions (see table 6). The data suggest, however, that the two regions in Germany may have a disproportionately lower percentage of school employees with advanced degrees (master's and doctor's) than would be expected.

- The "general education" area accounts for a significantly higher percentage than other areas in every degrees/certificates category. The areas of "general education," "counseling/guidance," "school administration," and "other" account for over half of the reported advanced degrees, with the remainder distributed among the 31 content areas of table 7.

Table 7. Percentage of higher degrees/certificates[1] [illegible] content area: September 1980

Content area	Percentage [illegible][2] degree/certificate				
	Total[3]	DO	MA	BA	NDC
Art	1.9	0.9	1.3	2.5	1.5
Automotive technology	0.2	—	0.1	*	3.4
Business	1.5	0.9	1.4	3.3	1.1
Computer technology	*	—	*	*	—
Consumer economics	0.1	—	*	0.1	0.4
Cosmetology	0.2	—	*	0.1	3.0
Counseling and/or guidance	5.6	10.3	10.7	0.3	6.1
Early childhood education	3.0	—	1.9	4.4	2.6
General education (e.g., elementary, secondary)	38.2	20.7	34.6	43.4	22.0
Electricity/electronics	0.2	—	0.2	0.1	1.1
English-as-a-second-language	0.6	—	0.6	0.6	1.9
Foreign languages	3.1	13.8	2.1	3.8	5.3
Graphics communications	0.1	—	*	0.1	—
Health	0.7	0.9	0.4	1.0	0.8
Home economics	1.2	—	0.5	2.0	0.8
Industrial arts	1.0	—	0.7	1.2	0.4
Language arts	5.0	2.6	3.8	6.6	1.5
Library science/instructional media	2.1	0.9	3.4	0.8	2.3
Mathematics	2.6	—	2.4	3.0	1.5
Medical/dental technology	0.1	—	0.1	*	1.1
Music	2.2	—	1.9	2.6	1.1
Nursing	0.1	—	0.1	*	—
Photography	0.1	0.9	—	0.1	0.8
Physical education	3.1	0.9	2.4	4.1	0.8
Psychology	1.3	3.4	1.3	1.4	1.1
Reading	2.9	2.6	4.7	0.8	6.6
Science	3.8	7.9	3.6	3.9	3.0
School administration	3.0	12.9	5.6	*	4.2
School psychology	0.4	6.0	0.6	0.1	1.1
Social science	6.7	3.4	5.4	8.4	3.0
Social work	0.3	0.9	0.4	0.2	—
Special education	4.2	1.7	5.0	3.3	6.8
Speech therapy	1.0	0.9	1.0	1.2	0.4
Vocational/career education	0.6	—	0.7	0.3	1.9
Other	3.2	7.8	3.4	2.3	12.1

[1] The total number of degrees/certificates reported was 9,351--116 doctor's degrees, 4,553 master's degrees, 4,418 bachelor's degrees, and 264 non-degree certificates.

[2] NDC = Non-degree certificate
BA = Bachelor's degree
MA = Master's degree
DO = Doctor's degree
Total = Total degrees/certificates

[3] Total may include more than one highest degree for a school employee and does not include some 332 "unknowns".

ANALYSIS

INTRODUCTION

This section examines education programs and services in some detail, and its conclusions serve as the basis for the recommendations and transfer arrangements that follow in the last two sections. It should be noted that Public Law 95-561, which authorizes the schools, Public Law 96-88, which provides for their transfer to the Department of Education, and the relevant legislative history make clear that the Congress intended that the education provided by overseas schools should be of high quality and equal to the best offered in stateside schools. The legislative history also stresses the great importance of continuity between stateside and overseas education programs, since most military dependents frequently rotate between the two systems. The analysis section of this chapter, therefore, contains comparisons with public schools in the United States.

Comparisons of this kind are meaningful, however, only in a very general way and can be useful only when those aspects of the situation that lessen the value of the comparison are recognized clearly. The basic reason for this caveat is that the overseas school system differs so much in significant ways from other U.S. systems that the element of similarity necessary to a meaningful comparison is lacking to some degree. For example, the overseas schools are scattered throughout 20 countries, whereas the stateside schools are much closer together, making coordination and cooperation between schools much easier. Also, since certain program comparisons rely to some extent on estimates of overseas school populations based on statistics for the continental United States, they are not to be taken too strictly, since the school population overseas may not be identical to that in stateside schools.

In order to obtain some perspective in reading this section of the chapter, it may be useful initially to make some very general comparisons of the DoDDS system with average public schools in the United States and with two other U.S. school systems similar to the DoDDS system. The latter two are (1) the U.S.-sponsored overseas schools that are assisted by the U.S. Government through the Department of State and (2) schools for military dependents located on military installations in the United States and Puerto Rico and financed through Public Law 81-874, title 1, section 6 (and therefore commonly referred to as Section 6 schools). (Section 6 schools are also discussed in chapter I.)

Public Schools in the United States

The number and types of education programs offered in DoDDS are similar to those of schools in the United States. Education programs in both DoDDS and stateside schools differ according to the size of the school, with smaller high schools having a smaller range of programs than larger schools. A recent survey of selected urban school jurisdictions in the United States of 100,000 or more students reports an average of 20.9 students per teacher compared to 22.3 in DoDDS. The average per pupil expenditure in the 23 largest U.S. school systems is presently $2,057 and for the DoDDS schools, approximately $3,305. Expenditures for educational supplies and equipment tend to be higher in the DoDDS system (reflecting higher mailing costs), and materials are less likely to arrive in time at least partially because of problems of shipping. Facilities in many DoDDS locations are comparable to the best in the United States, while in other locations, particularly Germany, they are located in old buildings not originally designed as school facilities. The faculty of the overseas schools compares favorably to teachers in stateside schools with respect to education and experience, while the student population differs from that in the United States mainly in that the great majority are dependents of military service members. In addition, recent cumulative results of accreditation by the North Central Association of Colleges and Schools for the DoDDS system are as good or better than those for other U.S. public school systems evaluated by the North Central Association.

U.S.-Sponsored Overseas Schools

There are approximately 160 U.S.-sponsored overseas schools that are assisted by the U.S. Government through the Department of State (abbreviated A/OS). They are located in nearly 100 countries and have a total enrollment of approximately 75,000 students. These schools are usually located in U.S. foreign service posts where DoDDS schools are not available. They receive U.S. Government assistance because they provide educational opportunities for dependents of U.S. Government employees abroad and because they demonstrate U.S. educational philosophy and practice, but, generally speaking, the assistance falls far short of providing the bulk of the school budget on a continuing basis. It is important to note that these schools do not form a system in the sense that DoDDS and U.S. school districts do. Rather, each A/OS-assisted school is an independent school, usually established by an association formed for the purpose and operated under the control of a local school board elected by members of the association. The schools vary enormously in size, resources, and composition of student body and staff. Complete data on the schools as a group are not available.

It is difficult to generalize about the A/OS-assisted schools because of their disparate nature, and therefore any direct comparison with the DoDDS system has only limited value. Nevertheless, some general differences between most of these schools taken as a group and the DoDDS system may be noted. The A/OS-assisted schools usually do not have as assured and strong a financial base, as many specialists to assist teachers, or as comprehensive a curriculum at the secondary level as the

DoDDS system. They usually have a much more international student body and teaching faculty, and in some countries they are subject to various requirements and regulations from local ministries of education. Also, the A/OS-assisted group usually features much stronger parental participation in operation and administration of the schools than has been characteristic of the DoDDS system to date.

At the secondary school level, the curriculum of the A/OS-assisted schools is usually oriented largely toward college preparatory work. The secondary schools are regularly accredited by U.S. regional accrediting associations other than the North Central Association (which, by mutual agreement, concentrates on DoDDS). As might be expected from the more academic curriculum orientation, these schools generally compare very favorably with college preparatory programs in schools in the United States, whether public or private. Scholastic Aptitude Test (SAT) scores for DoDDS students are not significantly different, on the average, than those for students in the A/OS-assisted schools.

Section 6 Schools

Section 6 schools are elementary and secondary schools for children whose parents live or work on military bases in the United States. Authority for funding and overseeing the administration of these schools resides with the Secretary of Education as provided in Public Law 81-874, title I, section 6 (1950). Section 6 schools, currently located on about 18 bases, enroll approximately 37,000 students and employ about 2,450 teachers and administrators. Thus, the Section 6 schools as a group are much smaller than DoDDS.

The Section 6 schools and the overseas schools are similar primarily in that they are both funded by the Federal Government, are located on U.S. military bases, and serve primarily dependents of military personnel. They differ in aspects of education programs, methods of funding, and governance. The curriculum in Section 6 schools must be consistent with the State educational statutes in the State in which each school is located, while the DoDDS curriculum is to be "of high quality," at least comparable to schools in the United States. Whereas Section 6 school budgets are based on per pupil costs in comparable schools in their respective States, the DoDDS budget is developed as part of the DOD budget process without a specific per-pupil cost formula. Also, Section 6 schools are each governed by a locally elected school board that determines policy subject to the review and approval of the commanding officer of the installation, whereas DoDDS schools are controlled centrally by DOD's Office of Dependent Schools, with a recently established advisory system at the national and local levels.

STUDENT PERFORMANCE

General Achievement

Standardized tests used to measure achievement in the overseas schools include the Standard Aptitude Test, the Metropolitan Readiness Test, the National Assessment of Educational Progress, the Basic Skills Assessment Program, and various tests and surveys related to the Five-Year Curriculum Development Plan. Available comparisons of results from some of these tests show that average DoDDS scores have been higher than average stateside school scores in most test areas.

Although 1980 averages for DoDDS seniors in both the verbal and mathematics sections of the Scholastic Aptitude Test were the lowest since 1976, these averages were higher than the averages for the nation. DoDDS students elected to take 11 of the 15 optional achievement tests, and on 9 of these, including the Test of Standard Written English, DoDDS seniors performed slightly to substantially better than their national counterparts. Only in two areas, mathematics level I and biology, did DoDDS seniors perform below the national average.

The Metropolitan Readiness Test scores for school year 1979-80 show that entering first graders in the overseas schools scored about the same as entering first graders in U.S. schools. Although some items from the Basic Skills Assessment Program are also incorporated into similar test programs administered in other U.S. schools, comparative information is difficult to interpret given the small size and weak sampling procedures used. During school years 1978-79 and 1979-80, a one-time-only National Assessment of Education Progress test showed that DoDDS 9- and 13-year-olds performed considerably better, and 17-year-olds slightly better, than their stateside counterparts in writing skills. In a survey conducted as part of the evaluation of the health program, DoDDS students scored higher than stateside students in areas covering knowledge of consumer health, family dynamics, and use of substances. Other tests and surveys conducted as part of the Five-Year Curriculum Development Plan have not yielded comparative data.

Drop-Out Rate

The overseas dependents schools do not have a mandatory attendance requirement. Very few students enroll in the schools and then drop out. DoDDS has made some attempts to collect data on drop-outs, but no systemwide survey has been conducted to date.

Data on Graduates

A longitudinal study of 8,400 DoDDS sophomore and senior high school students, called High School and Beyond, has been undertaken. During school year 1979-80 baseline data were collected on the group and follow-up surveys on the seniors will be initiated in spring 1981 if funds are available. (This study is described earlier in this chapter in the section on Research, Improvement, and Evaluation.)

INSTRUCTIONAL PLANNING

NCA Accreditation

Reports of the North Central Association of Colleges and Schools (NCA) show that DoDDS and one State are the only members of NCA (whose membership consists of 19 States plus DoDDS) having no schools listed with violation warnings in school years 1978-79 and 1979-80. Approximately 80 percent of the DoDDS schools are accredited with no deficiencies cited in NCA visit reports, while the remaining 20 percent, although accredited, have deficiencies cited that require corrective action.

By far the greatest number of deficiencies cited by visiting evaluators concern personnel credentials. These problems are considered to be tied to the DoDDS recruitment and staffing procedures, which often do not result in placing needed school personnel in a timely way. Recurring problems in the area of facilities maintenance reflect the age of many DoDDS school buildings, and the frequency with which temporary structures are kept in use beyond their expected structural life span.

In comparing the accreditation process in DoDDS to that underway in stateside schools, it should be noted that the NCA evaluators must spend a good deal of time in areas that can be rapidly screened stateside--facilities inspection and personnel qualifications. In stateside school systems, local government personnel (fire marshal and building and health inspectors) and State officials (in teacher certification offices) share the responsibility for ensuring program quality.

Areas of concern.--Results of the NCA visits during school year 1980-81 are not yet available. However, in briefing sessions with ODS staff in February 1981, the accreditation evaluators highlighted these areas of concern:

- Incomplete reporting and documenting of personnel credentials.

- Lack of continuity of instruction and curriculum implementation across grade levels, from school to school, and between elementary and secondary levels. DoDDS has a sequential curriculum plan, but teacher implementation is not always consistent, and communication is sometimes poor even within buildings.

- A marked shortage of inservice education activities.

- Insufficient financial and staffing support for the media program.

- The need for increased ongoing administrative training for school principals (e.g., training in management, curriculum, leadership, and communication).

- Lack of administrative support for high school work/study programs, which often results in minimal or nonexistent programs.

- Insufficient staff and programs in ESL to meet the needs of students with limited ability in English.

- Program deficiencies in the area of education for the handicapped and for the gifted/talented caused by personnel shortages.

Recurring comments.--A random sampling of recent NCA evaluation reports of visits to both elementary and secondary schools in five of the regions resulted in identification of some recurring comments, despite the fact that the reports were prepared by a number of different evaluators. Some of the observations made in these reports and their frequency are indicated as follows:

- By far the most frequently mentioned strength was the competence, dedication, and enthusiasm of the teaching staff.

- Several reports show that insufficient time was set aside for the school self-study conducted prior to the NCA visit. Only minimal faculty was involved in the study, and in some cases the work was not considered an adequate exploration or in-depth analysis of the particular areas being considered.

- Space, appropriate facilities, storage area, and student work/activity areas were considered inadequate in art, physical education, and/or science in almost all of the schools in this sampling.

- Other frequently mentioned problem areas were unsatisfactory equipment maintenance and repair (for such diverse equipment as that used in business education, metal shop, and instrumental music) and extensive delays in receiving supplies of all types.

- The reports reveal considerable unevenness across schools both in the degree and success of parental involvement in school programs, including the host nation program, and also in provision of and satisfaction with inservice education activities.

- In several secondary schools the evaluators questioned whether the school curriculum was sufficiently responsive to the needs of a significant number of students performing below grade level.

- The greatest level of concern by the different evaluators, however, was in the area of curriculum planning and instructional improvement. The NCA visiting teams repeatedly identified an insufficient level of faculty participation in curriculum planning and little or no communication among staff across grade levels or within departments in secondary schools. The reports stress the lack of continuity in school program evidenced by the absence in many subject areas of student performance objectives, course outlines, and an internally cohesive, purposeful instructional program characterized by goals and staff consensus.

Conclusions.--If accreditation visits are to have any real impact as an instrument of change, the findings from such visits should be regularly and systematically fed into the DoDDS planning cycle. The less formal approach presently followed by DoDDS in using NCA findings does not assure that quality is maintained or that problem areas are promptly and adequately addressed. Necessary policies and procedures, as well as related funds, staff, organization, and other essential resources, must be provided at top levels in order to make certain that recommended changes actually occur in local schools.

The Curriculum Review Process

The 5-year curriculum review process is a conceptually sound mechanism for ensuring that the objectives, instructional materials, and evaluation practices of the total curriculum and its individual parts are in a constant state of evaluation and improvement. The intent of the process to involve the various levels (DoDDS headquarters, regional offices, and local schools) in the review is consistent with good practices for curriculum review found in many large school systems in the United States. Curriculum review decisions made in most stateside schools are given final review by the superintendent and approval by the school board prior to being funded and implemented in the schools. Two weaknesses in the present 5-year curriculum review process are that (1) local schools as a group do not participate sufficiently in the process and (2) curriculum review decisions are not necessarily given the budgetary and logistical support required to ensure their implementation.

Participation in curriculum review.--Interviews with a large number of school personnel overseas indicate that the main inputs to the 5-year curriculum review process from outside ODS appear to come from the regional coordinators' own knowledge and experience in particular program areas and from the work of selected teacher task forces created by that coordinator. The size and geographic dispersion of most regions have made it difficult or impossible for a coordinator to form task groups represented by teachers from every locale in a region. Most teachers interviewed, some in the system up to 10 years, claimed never to have served on a task force. In several schools visited, particularly those far removed from their regional office, teachers asserted that they had never heard of the Five-Year Curriculum Development Plan or the review process it entails.

Discussions with local school principals, both at stateside meetings and in visits conducted overseas, indicate that principals rarely if ever participate in systemwide planning of education programs. Most principals interviewed stated that they left local instructional decisions to the teachers, and most parents who were contacted indicated little or no involvement in such decisions. An additional point to be noted is that the great majority of local schools' curriculum development committees (CDC's), heretofore composed of teachers and in many schools of parents as well, have been disestablished because the professional employee associations will not permit teachers to participate in CDC meetings after school hours without additional compensation.

These facts strongly suggest that the goals of the 5-year curriculum review concept are being eroded in two significant ways. First, the lack of direct participation by most local schools in 5-year curriculum review activities decreases the probability of a satisfactory tie between local instructional planning and system instructional planning. Second, because teachers apparently make the majority of instructional decisions in local schools, and because curriculum planning as a total school or community activity has been abandoned as a result of the presently dormant CDC's, there is little guarantee that standardization within programs exists locally, let alone systemwide.

Implementation of curriculum review decisions.--Discussions with DoDDS school administrators and teachers indicated that more attention should be paid to setting priorities within the total instructional program. Final decisions made in the curriculum review process with respect to individual programs inevitably raise expectations that ultimately all such programs will be treated equally in terms of funding and implementation. The fiscal and logistical support that is actually provided to individual programs establishes ex post facto priorities that are not necessarily explicit at the time curriculum review decisons are made.

A related problem mentioned by a large number of DoDDS administrators and teachers in regional offices and local schools is the failure of DoDDS funding and supply mechanisms to be responsive to 5-year curriculum review decisions. Virtually all of these educators agree that the review process will never have the intended impact at the local school level until adequate budgeting, accountability, logistical, and administrative procedures are enacted to implement curriculum review decisions.

Conclusions.

- Necessary corrective steps should be taken to assure that the 5-year curriculum review process operates as intended. The three tiers of the DoDDS organizational structure (ODS, regional offices, and local schools) presently do not appear to contain the necessary linkages to assure the kind of standard practices intended by the 5-year curriculum review process with respect to planning, implementation, and evaluation of education programs. Instead, two processes for making decisions about education programs may be taking place rather independently of one another. One process is the 5-year curriculum review itself, which involves close interaction between ODS and regional offices and in some cases extends to local schools through contact between regional coordinators and selected teachers. The other process has to do with instructional decisions made in most local schools, which involve teachers making such decisions with little or no linkage to the 5-year process because of limited communication and association with above-school-level staff and inoperative CDC's. Although the two processes are not necessarily mutually exclusive, the apparent gap in ongoing communication and contact between many regional staff and many local schools, combined with the absence of planning as a group at the local level, does little to assure compatibility between curriculum review and development at top levels in the system and curriculum practices in local schools.

- Individual programs should be prioritized and the necessary fiscal, logistical, and administrative support should be provided to assure implementation of curriculum review decisions. Even if apparent gaps are mended in a systemwide process of curriculum review, the process will achieve effective impact only to the degree that curriculum review decisions feed systematically into the processes that provide money, staff, and material resources. Requirements include firm policy statements and budget commitments, related inservice education, and logistical support systems that ensure timely delivery of educational resources.

PROGRAMS AND SERVICES

Administration

As previously described, the organization for administering education programs and services at the DoDDS headquarters (ODS) level consists of an Education Division with three branches (curriculum, supplementary education, and evaluation), staffed by a division chief, branch chiefs, and coordinators for each education program and service. This organizational structure is virtually duplicated in each DoDDS region to administer education programs and services at that level. Although school principals are formally responsible for administering education programs at the local level, in most schools department or grade-level chairpersons actually perform the day-to-day administrative tasks.

Coordination among the three levels (i.e., ODS, regional offices, and local schools) in delivering identical education programs and services throughout the system depends in part on the existence of a clear definition of the authority and responsibilities given to roles at the various levels in the administrative hierarchy. Interviews conducted overseas with a large number of educational staff members in regional offices, as well as with principals and teachers in local schools, strongly suggest that more precise definition of such authority and responsibilities is needed with respect to certain roles at all three levels. Some of the main problems are associated with (1) lack of clarity in the degree of authority to be exercised by ODS coordinators in dealing with their counterparts in regional offices; (2) lack of clarity in the line of authority, shown by the ambivalence expressed by many regional coordinators in attempting to respond to dissimilar instructions received from superiors in the regional office, on the one hand, and education division staff members at ODS, on the other, and (3) the absence of any real authority, as asserted by many regional office staff, to implement curricular changes at the local school level.

Basic Curriculum

Arts and Humanities

DoDDS reports 116 personnel on board (40 in art and 76 in music) and a need for an additional 176 teachers. The resulting total of 292 spaces for art and music appears to be well within reasonable requirements for a school system of about 136,000 students and 270 schools. By comparison, in 1980 Anne Arundel County Public Schools (Maryland), with a student population of 72,189, employed 144 art teachers and 168 music teachers. Data gathered from administrators, teachers, parents, and students overseas support the need for increased staffing for this program. The need for programs is particularly great at the elementary level and in isolated schools.

Career Education

Career education is dealt with as part of vocational/career education in this section.

Foreign Language/Intercultural Education

Foreign language/intercultural education completed the review phase of the Five-Year Curriculum Development Plan in 1980. A number of curriculum materials were discovered to be outdated, and new materials were identified as possible replacements. Future plans call for pilot testing many of the new materials and for conducting necessary inservice education for materials ultimately selected for integration with the program. The number of qualified foreign language teachers is sufficient for present enrollment levels.

Health/Physical Education

During school year 1980-81 the DoDDS health and physical education program entered the first year of the Five-Year Curriculum Development Plan. In a survey conducted as a part of the evaluation of the health program, DoDDS students scored higher than stateside students in areas covering knowledge of consumer health, family dynamics, and use of substances. With health and physical education combined in DoDDS, it is difficult to make comparisons with school systems that report figures only for physical education. Nevertheless, the proposed FY 1982 staffing level of 84 physical education teachers (62 on board and 22 new teachers) seems significantly below requirements for a system with 270 schools. With just over half of the student population of DoDDS, for example, Anne Arundel County Public Schools (Maryland) employ 211 physical education teachers.

Information gathered from principals, parents, teachers, and regional office staffs overseas has identified increased staffing in physical education as a major program need.

Language Arts

Language arts completed the full cycle of curriculum review in 1977-78 and presently is a fully implemented program. The review cycle will begin again in 1982-83. The program is fully staffed with qualified teachers. A recurring need, however, is adequate inservice education, particularly for new teachers.

Mathematics

The mathematics program is now in the third year of the curriculum review cycle. The program is adequately staffed and has sufficient resources. Future plans include more emphasis on new technology.

Reading

The basic reading program has been cited by parents, teachers, and administrators as one of the exemplary programs in DoDDS. There is a need, however, for more reading improvement teachers. DoDDS presently has 146 teachers serving a population of 136,000. In comparison, Fairfax County with a population of 100,000 has 200 reading teachers, 100 title I reading positions, and 10 above-school-level staff who are reading specialists. DoDDS has a goal of providing a reading teacher for every high school and for every elementary school with an enrollment of 450. There is a particular need for reading improvement specialists at the 7th- and 8th-grade levels.

Science

DoDDS has invested in a number of high quality science programs. Although the science program is adequately staffed, many science teachers are primarily qualified in an area other than science. In the perception of some administrators this has led to a decrease in program quality. Some problems have developed in local schools due to competing priorities for replacing expendable items, leading to difficulty in maintaining programs.

The science program in the elementary schools needs to be emphasized. Teachers are not adequately prepared to teach science, and principals have not been able to monitor the teaching of science due to the press of administrative duties.

Social Studies

The strength and weaknesses of the DoDDS program are reported to be similar to those described for social studies programs nationally in the detailed *National Survey of Science, Mathematics and Social Studies*, reporting on a survey conducted in 1977.

In order to assess student achievement, three objective-referenced tests based on the six major goals of the DoDDS social studies program were administered to grades 4, 8, and 11. On the total test, fourth graders scored an average of about 70 percent of the items correct while 8th- and 11th-graders scored about 68 percent and 65 percent, respectively. The reports also assess teacher awareness of the social studies curriculum. Although 20 percent of 4th-grade teachers and 30 percent to 40 percent of 8th- and 11th-grade teachers reported that they were "very familiar" with the DoDDS social studies goals and objectives, most teachers felt that they needed inservice training to help them use existing materials and to learn new teaching techniques.

Supplementary Programs and Services

Computer Education

A full computer education program is not presently in operation. Questions related to computer hardware specifications, acquisition, and use have to be resolved before a computer education program can be fully developed and implemented throughout the overseas school system. The question of program planning and related resource needs, both human and material, should be addressed in the cycle of the Five-Year Curriculum Development Plan that occurs during school year 1981-82.

Educational Media

Problem areas.--Problems identified by the media coordinators in the six DoDDS regions included the following:

- Budget cuts required thus far in school year 1980-81 caused cutbacks in planned staffing, equipment, and inservice training. These cuts occurred at both the headquarters and regional levels and resulted in cancellation of a number of materials orders.
- Coordinators and school-based media specialists have been unable to remain current with trends, technology, and research in the media field. Isolation from professional associations and limited travel funds have hampered professional growth opportunities and the extent to which regional media coordinators can interact with school-based personnel to share information and provide support. Inservice training is needed, particularly in Panama where elementary school media centers are just being established and classroom teachers are untrained in using media equipment and techniques.
- Staffing is insuffcent in several regional offices to meet program objectives and make full use of equipment. Technical and professional staff positions identified in the budget process remain unfilled due to the need to prioritize staffing decisions. Support services for teachers (graphics, distribution, maintenance, and professional research) are inadequate to meet requests.
- Procurement processes for media center materials are often unsatisfactory. For example, a newly opened elementary school in Germany waited 2-1/2 years for the books for its media centers. An order for 16 periodicals for Madrid High School was delayed 9 months at Defense General Supply Center (DGSC), with the result that the school will not receive the publications for an entire year. It was suggested that all procurement procedures be computerized as soon as possible and that multiyear book and periodical jobber contracts be let, in order to speed the process. Hardware repair is also characterized by delays, uncertainty of service, and poor quality of repairs.

Comparisons.--Many of the problems noted by the regional coordinators are reflected in table 8, which shows a comparison of the DoDDS media program with those of stateside schools and with various goals and standards. In some respects, the DoDDS program meets or exceeds the standards of the NCA; it does not meet all the standards of the professional library/media associations. Although the DoDDS program has more books per pupil and more audiovisual titles per school than the average

Table 8. Comparison of ratios in selected categories of the DoDDS media program (FY 1980) with media programs in U.S. public schools with media centers,[1] DoDDS goals,[2] NCA standards,[3] and national standards[4]

	Data		Goals/standards		
Ratio[5] of —	Stateside schools	DoDDS schools	DoDDS	NCA	National
Professional personnel to student	—	1:675	1:125-749 2:750	1:400, elementary 1:300, secondary	1:250 or major fraction thereof
Books to students	13:1	16:1	20:1	At least — 10:1, elementary 5:1, jr. high/middle; 5-12:1, secondary	At least 20:1
Expenditures to students	$34.12:1	[6]$19.33:1	$34:1	$6-$10:1	$150:1
Periodical subscriptions to students	57	36	—	—	—
Audiovisual titles to schools	1,072	1,463	—	—	—

[1] From *Statistics of Public School Libraries Media Centers* by Lance Hodes and Robert A. Heintze. Prepared for the National Center for Education Statistics.

[2] From DoDDS handbook now in preparation.

[3] North Central Association of Schools and Colleges.

[4] Developed jointly by the American Association of School Libraries and the Association for Educational Communication and Technology.

[5] Ratios are approximate.

[6] Excluding the Panama region (where expenditures were considerably higher than in other regions because of the establishment of new centers), average per pupil expenditures in the remaining five regions were $15.27.

for stateside public schools with media centers, it has fewer periodical subscriptions per school and spends much less money per pupil. (It should be noted also that at least half of the DoDDS films are more than 10 years old and should be replaced.) The complete DoDDS goals for staffing, collections, equipment, facilities, and expenditures are included in a new manual to be printed in school year 1981-82. As shown in table 8, these goals call for one full-time media specialist in schools with an enrollment from 125 through 749 and an additional staff for larger schools. Current figures show that, according to these standards, the media program is lacking 100 professional positions and 140 support personnel.

Funding.--The Elementary and Secondary Education Act, title IV specifically sets aside funds to support library and other programs for the DoDDS schools. However, DoDDS has not applied for such funds since 1974, citing that a sufficient appropriation is available to meet such needs.

Conclusions.--The DoDDS media program has excellent personnel and some very fine components, such as a handbook in process and a recently completed publication on program guidelines and student objectives. In order to maintain the program, however, more attention needs to be paid to support and development. Because decisions about budget priorities are made at the regional level and there has been wide disparity between regions in the funds spent on education media, it has not been possible to move toward more balance among regions in resources and services. Also, because budget problems in recent years have resulted in cuts for the media program, purchases barely maintain the collections with replacement materials. Growth and development have not been possible.

- Regional expenditures for the media services program should be increased to meet overseas school standards, with the long-range goal of strengthening and balancing the systemwide collections.
- The Congress should remove the overseas school system from eligibility for appropriations authorized presently under Public Law 95-561, title IV, section 403(c), since direct appropriations are available in the overseas schools budget.
- Additional staff should be added to meet ODS standards.
- Priority should be placed on training programs for media personnel, particularly for the part-time staff without professional media training.
- Requisition and maintenance systems should be modified to improve efficiency. Consideration should particularly be given to (1) annual renewal of contracts to jobbers for procuring books and

periodicals, based upon satisfactory service; (2) establishment of a computerized requisition process; and (3) development of a maintenance and repair system for audiovisual equipment staffed with technical personnel and stocked with extra parts.

Extracurricular Activities

In many overseas areas, extracurricular school activities take on a special importance because of the isolation of the schools and/or the presence of students in dormitories on a 5- or 7-day-week basis. Systemwide, a variety of extracurricular activities are provided ranging from ski weeks in the Alps to study trips to the Galapagos Islands. Many students, however, have commented on the lack of after-school activities of a more mundane nature, such as intramural sports, and many parents have commented on the lack of a full range of extracurricular activities in a number of overseas schools. In some communities youth activities sponsored by the military services help fill these gaps.

Extracurricular activities offered vary considerably from school to school. Busing situations in many areas preclude daily after-school activities, and identifying qualified and interested staff to assist with such activities is also a problem. In most isolated communities, success in providing after-school activities depends upon involvement of the school with the larger military community.

Host Nation Program

Although only limited data are available on a systemwide basis, it seems reasonably clear that the priority and resourcefulness devoted to the host nation program vary widely among regions and individual schools. There are excellent local efforts in many schools toward developing genuine understanding and appreciation of the culture and language of the host nations. However, the evidence of program effectiveness that is available centrally does not suggest grounds for complacency with respect to the systemwide achievement of the existing program objectives, especially with respect to personal contact and experience in social and educational settings outside the classroom.

For example, the recently published Summary Report of the DoDDS Comprehensive Social Studies Program Evaluation (spring 1980) includes the following findings:

- About two-fifths of all the students interviewed (in a systemwide sample of grades 4, 8, and 11) indicated that they did not get a chance to interact with host nation students of their own age.
- About a third of the 11th graders and two-fifths of the 8th graders felt that their friends at school did not like living in the host nation.

- Less than half of the 8th and 11th graders reported that during their stay in the host nation they had become a "little more comfortable" or "much more comfortable" when meeting students of their own age with whom they did not go to school.

Comparability.--Despite a sizable commonality of objectives in many cases, a formal direct comparison of the DoDDS host nation program with appropriate segments of intercultural programs in schools in the United States is not possible to any major extent because a suitable data base for a representative sample is lacking for both groups of school systems. However, it appears that the DoDDS system has a significant opportunity to more fully utilize the educational potential of its unique locus in other countries and to expand the host nation program beyond its present scope by incorporating some of the ideas and objectives that characterize the best intercultural and international programs in stateside schools. Some of the broader international objectives could be better served outside the host nation program proper, but should be planned and pursued in close coordination with efforts in the host nation program.

Key issues.--Insofar as a reasonable judgment is possible on the basis of available data, it appears that the DoDDS system has room for significant growth in fully exploiting the educational potential of its locus in other countries. Key issues may be summarized as follows:

1. Among sizable concentrations of U.S. Government employee families abroad, there often is a historic tendency for most of the group to focus its activities largely within the local U.S. community. With the growing trend toward more on-base housing for military dependents, particularly in high-cost countries, the host nation program has an increasingly important mission to help U.S. students overcome what is often a general isolation from the local and national culture of the host country. Although it would seem that a very high priority would be accorded to providing suitable opportunities for students to benefit from the extraordinary potential of being in a school system located in other countries, such a priority is not yet reflected in budgetary provisions at any level of the DoDDS system--local, regional, or worldwide. Resources are required to provide opportunities for students to move beyond the classroom more extensively in their contacts with host nation people and culture, for host nation and U.S. teachers to plan together, and for concerned teachers, coordinators, and administrators to work cooperatively across national and regional boundaries.

2. The programs in various regions have suffered from isolation in various ways, not only from relative isolation from each other in times past, but also, particularly in recent years, from weaknesses in knowledge of and productive linkages to trends, accomplishments, and available materials in intercultural and international studies in the United States, where there has been much activity and progress in the past decade. While the full extent of DoDDS linkage to these developments is unclear, it is

sufficiently apparent that the system as a whole is not very extensively linked to the mainstream of U.S. educational development in intercultural studies--a curriculum area of growing importance in an interdependent world. The linkage is important both for what can be gained as well as shared. Linkage is needed with U.S. university foreign area studies centers, inservice teacher education programs, outstanding school programs, teacher centers, and regional education laboratories. Because the study of countries other than the host nation is not normally carried out within the host nation program, but elsewhere in the curriculum, much of the interregional and U.S.-DoDDS linkage needed is between the host nation program in each country and the social studies or arts and humanities programs in other countries and area studies programs in the United States.

3. There is a fair question of whether the DoDDS goals and aspirations for the host nation program--or for related intercultural/international aspects of the curriculum--are sufficiently broad, deep, and demanding. Either in the host nation program, elsewhere in the curriculum (perhaps in the social studies), or preferably through a combined effort among the host nation program and other curriculum areas, the study of the host nation could be more effectively related to the wider study of other cultures at home and abroad, to the context of world problems and global perspectives, and to efforts to deepen students' understanding of themselves and their own culture and nation in world context. In this regard, the host nation program has great potential for--

- Deepening the understanding both by DoDDS students and teachers and also by their peer groups in the host country of the culture and people of each other's country.
- Enabling DoDDS students and teachers and their peer groups in the host country to mutually explore and better understand the historical context of the relationship between the two nations and the circumstances and national needs that underlie the presence of DoDDS schools in the host nations.
- Helping DoDDS students and teachers bridge outward from learning about the host country to developing a broad international/intercultural perspective.
- Motivating DoDDS students and teachers to learn foreign languages.
- Enabling DoDDS teachers and curriculum coordinators in each country to develop effective approaches and materials for study of the host nation that can be shared throughout the six DoDDS regions as well as with the educational community in the United States, to help meet common and specialized needs in international/intercultural understanding.

4. A related issue is the lack of a clear locus of responsibility outside the host nation program for the balance of the DoDDS system's intercultural/international needs and responsibilities.

DoDDS does not endeavor to address all of the above possibilities and concerns through its host nation program. Some are dealt with elsewhere in the curriculum, and the locus of responsibility for the remainder is unclear or unassigned.

Resources in ED.--There are a number of ED programs that can provide useful sources of information about developments and resources in the United States, technical assistance, and linkage guidance for the host nation program. These opportunities will be actively pursued in the coming months. The most directly useful of these programs are the following:

- Ethnic Heritage Studies
- Various international studies and foreign language programs under what was originally title VI of the National Defense Education Act, particularly the Centers program and its outreach dimensions, the Citizen Education program of section 603, and selected studies and instructional materials produced by the section 602 Research program.
- Bilingual Education
- Environmental Education
- Improvements in Local Educational Practices
- Metric Education
- National Diffusion Programs
- Teacher Centers
- The educational research centers and regional laboratories funded by the National Institute of Education

Conclusions.

- More inservice education opportunities should be provided for U.S. and host nation teachers in the overseas system to work together--
  - To develop mutual understanding of their respective national and individual educational concepts, approaches, and classroom instructional and management techniques.
  - To reinforce their mutual efforts toward achieving the full potential of the host nation concept throughout the curriculum.
- Higher priority should be given to increasing contact between U.S. students and their peers within the host nation and to expanding opportunities for the host nation program to move beyond the classroom and into the local community and other parts of the host nation (through field trips, overnight programs, and joint workshops and seminars with host nation students and teachers.)

- Further development of student exchange programs between DoDDS schools and host nation schools (with the student living either at home or in the homes of host families in the host nation) should be supported at every level.

- A solid evaluation program is needed to assess the effectiveness of the host nation effort and to determine the extent to which the program carried out under the auspices of the overseas schools contributes to students' understanding of the host country's people, culture, and language (in contrast to the understanding gained simply from residing in the host country).

- Increased systemwide planning and sharing is needed to enable each region to contribute more fully to helping the other regions meet their curriculum development, instructional materials, and methodology needs in intercultural and international studies, particularly in such fields as social studies, foreign language, and the arts and humanities.

- Much better linkage should be established with individuals and organizations developing innovative theories, practices, research, and materials in intercultural/international education in the United States and elsewhere. Some of the linkage would involve the host nation program proper, but much of it would be more closely related to intercultural/international objectives and efforts elsewhere in the curriculum, often in the social studies. Productive steps toward improved linkage include the following:

  - Formation of a resource group of experts in intercultural/international learning (including school-level practitioners) to serve on a consultant basis to the headquarters and the regions.

  - Development of related groups or lists of area studies specialists to provide important specialized assistance.

  - Development of bilateral cooperation with host country schools and educational systems, perhaps with the assistance of the National Council for Social Studies and the International Council on Education for Teaching (ICET), both of which have active members in many of the major countries where DoDDS schools are located. These organizations could provide DoDDS educators abroad with some important points of contact with local education leaders and facilitate development of joint projects in various host nations.

- Particularly in light of the expanded concept of the host nation program reflected in this report, the host nation program should have a full-time coordinator at headquarters as well as in the regional offices. The importance, scope, and complexity of the host nation program require that it receive full-time attention at both levels. Full-time leadership at the country level could be justified in some countries as well. In addition, clarification is needed of three relationships of the coordinator at the headquarters level: To regional coordinators, to national professional reference groups in the United States, and to colleague coordinators at headquarters, whose interdisciplinary involvement is essential to a well-rounded host nation program.

o More coordination in curriculum design and in administrative arrangements needs to be developed at both headquarters and regional levels in order to more effectively tie together study of the local culture with broader intercultural and international concerns. This could be done in various ways, including the following:

  - A two-way approach could be developed in which the overseas students and their teachers not only learn about the host nation but also serve as a resource to the schools of the host nation in improving their understanding of the United States and its language. This approach would require a systematic effort by the overseas school staff to improve cooperation with host country educational authorities at all levels, as well as to establish or expand productive relationships with local host country schools.

  - More extensive and productive relationships should be developed between study of the host nation alone and study of the United States and the host nation in comparative perspective. This might include study of (a) the historical and current relationships between the host nation and the United States, including the military alliance and related historical context that underlie the very presence of every DoDDS school, student, and teacher in the host nation, and (b) the interaction between the two nations, their respective regions, and the rest of the world in the context of global interdependence. Much of the responsibility for this could lie outside the host nation program proper, but should be developed in close cooperation with the host nation program.

  - Some priority attention should be given to cooperative experimentation with a binational teacher center approach to developing mutual understanding. Suitable program opportunities and resources should be provided so that U.S. and host nation teachers could work together in developing curriculum units, educational materials, and instructional approaches for improving the teaching about the other country and its language in their respective schools.

Inservice Education

Research has repeatedly pointed to the value of inservice education in effecting school change, acceptance of innovation, and instructional improvement. It is very important that the overseas school system establish a high quality, ongoing inservice education program.

Inservice needs assessment.--A number of means have been used recently to assess DoDDS inservice education needs. One was a survey of needs by region conducted in 1980, and another was a survey questionnaire completed by teachers in a sample of schools in the same year. Interviews with school personnel overseas and a survey of educational needs completed by principals also provided information on inservice needs.

In all these assessments, inservice needs in title XIV areas were consistently expressed. Education for the handicapped was singled out as representing the greatest need. In fact, interviews with some teachers indicated lack of confidence in their ability to deal adequately with the handicapped even after having participated in inservice activities and university courses in special education.

English-as-a-second-language, vocational education, and compensatory education were also mentioned by teachers and administrators alike as areas for the most intensive inservice activities. Education for the gifted/talented was frequently mentioned as well. Other content areas addressed for inservice education by one or more of the surveys were science, reading, language arts, and health/physical education.

The 1980 ED survey questionnaire completed by teachers in the sample schools produced findings that touched on a number of aspects of total inservice education. The principal findings are summarized as follows:

- Inservice sponsorship: While most of the inservice education in which teachers participated during the previous months was sponsored by the schools, some inservice was also sponsored by the region and a lesser amount by DoDDS headquarters.

- Topics: With each school a list was prepared of the various inservice topics in which teachers had participated in the last year. There were almost as many topics given as there were teachers responding to the survey, with many closely related subjects called by different names. However, clustering of related topics revealed reading, mainstreaming, and health as the most common inservice topics.

- University course work: Of the small proportion of teachers who indicated that they had participated in university course work, the greatest number said that they had themselves paid for the university courses. The most common curricular areas for such study were mainstreaming, reading, and language arts.

- Purpose for enrolling in courses: There were several possible reasons offered in the survey for taking university courses: Professional development, personal development, and career advancement. Most teachers said their purpose for taking university courses was further professional development. The second most frequent purpose stated was a combination of professional and personal development.

- Participation in professional activities: Very few teachers indicated that they had participated in professional activities such as curriculum development, research, publications, conference presentations, and the conduct of inservice education for others.

- Training goals: Of all the questions in the survey, the greatest number of teachers responded to the one on training goals. The predominant goal of the teachers was to obtain a higher degree (usually a master's and sometimes a master's plus 30 or a Ph.D.). In addition, teachers clearly expressed a need to take courses (social studies, writing, administration, gifted/talented, counseling, and English-as-a-second-language) for such purposes as broadening their knowledge in particular disciplines, learning about new education areas, helping themselves grow as persons, and becoming certified or recertified.

- Method of achieving goals: Teachers usually indicated that university study was the method by which training goals would be accomplished. The next most common method was through DoDDS inservice or through a combination of university study and DoDDS inservice.

The survey results suggest a number of tentative conclusions:

1. Most inservice education seems to be conducted on an individual school basis. A systemwide or regionwide inservice education program, with goals and activities common to many schools, is not evident.

2. Although few teachers said they had participated in university courses during the past 12 months, the university was the most important variable mentioned in their response to the question on achieving future training goals. For example, most expected to pursue a higher degree at a university and most expressed an interest in broadening their knowledge or receiving new knowledge in their discipline or a new discipline. Clearly the implications are that opportunities for teachers to participate in university courses should be increased.

3. Teachers participate in few professional activities such as conference presentations, publishing, research activities, and conducting inservice activities. When they are involved in research activities, it is usually in connection with working toward a higher degree. It might be assumed, then, that more opportunities for university courses, and research (both descriptive

and empirical) would be utilized by teachers to improve instruction. Likewise, the experience of teachers involved in preparation for publishing and conference presentations would have a ripple effect upon the institutional program. Therefore, professional materials and resources, as well as courses in higher education, should be available to overseas teachers.

Comparability.--It is difficult to compare inservice programs overseas with those in the United States. Attention to inservice education in U.S. public schools is comparatively recent. Of the stateside programs that are underway, data are not yet sufficiently complete and comprehensive to make comparisons because of the rapidity with which the number of such programs has increased. Furthermore, both the quality and availability of inservice programs are greatly diversified from State to State and district to district.

Despite the relative newness and distinct unevenness of stateside inservice education, several trends and recent developments suggest approaches for consideration in the overseas program. One is the high level of interest in many U.S. school districts throughout the nation in teacher centers, which are committed to peer teaching and to active and significant teacher involvement in all aspects of inservice--needs identification, program planning and delivery, and evaluation. Teacher centers differ greatly in their structure, programs, goal, level of funding, and types of training and resources offered. The Federal Government now funds 99 projects with 140 centers, but the concept has spread far beyond the limitations of that program so that it is estimated that there are now about 500 teacher centers of various types nationwide.

There have also been new developments in the field of inservice research. Through centers and center-related projects, through the work of other educators in school districts, colleges, and universities, and through categorical training programs, a body of knowledge has begun to appear related to inservice needs analysis, program evaluation, and resource identification. The characteristics of effective inservice training are being examined and the implications for inservice of adult learning theories are being considered.

For example, a recent research study[1] sought to identify the most effective setting, materials, and procedures in programs of professional development for educators. The results of that review suggest that professional development programs will increase their likelihood of success if planners do the following:

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[1] Gordon Lawrence and David Harrison. "Policy Implications of the Research on the Professional Development of Educational Personnel: An Analysis of Fifty-Nine Studies," 1981 Report on Educational Personnel Development. Washington, D.C.: 1980.

- Involve teachers and other professionals in initiating, planning, scheduling, and conducting development activities.
- Design programs to be a collective effort of the faculty, with common purposes directed toward general faculty development, rather than an attempt to rectify deficiencies and needs of individual faculty members.
- Fund professional development activities in ways that permit individual schools to sponsor them, to design activities, and to select inside and outside leadership as appropriate.
- Schedule activities at times that do not compete with but complement other professional obligations.
- Select diverse program patterns that fit situations--self-instruction, peer study groups, college courses, one-to-one consultation--instead of relying heavily on the overused general workshop pattern.

These recommendations echo the findings of an extensive survey[2] of 5,000 teachers, teacher educators, and community members designed to identify both what is occurring in inservice education and also what is desired/needed. The respondents agreed that:

- Currently, teachers do not participate in enough inservice education.
- Inservice education should directly help teachers improve their teaching skills.
- Specifically, there is need for in-classroom follow-up of inservice programs.
- Teachers need more inservice education that directly addresses the special needs of children, particularly the handicapped and the gifted/talented.
- Inservice education should be provided that helps teachers to develop personally as well as professionally.
- Teachers would be inclined to participate more frequently if inservice were offered at more convenient times.

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[2] Samuel J. Yarger, Kenneth R. Howey, and Bruce R. Joyce. Inservice Teacher Education. Palo Alto, Calif.: 1979.

- Teachers currently are involved in developing and implementing inservice programs. Teacher involvement should be expanded in these areas as well as in the areas of evaluation and participation in local school advisory bodies.
- Teachers receive most of their exposure to innovative approaches to teaching through school district workshops.
- School administrators do not currently serve as instructors in many inservice programs, nor is an expanded role in instruction indicated.
- College professors are the most appropriate instructors in inservice programs designed for general professional or personal development, career advancement, and credential acquisition.

In 1980, the National Inservice Network of Indiana University published *Quality Practices in Inservice Education*. It emphasizes three areas:

- Creation of an inservice system as part of the organization itself.
- Characteristics of good programs--needs-based, responsive, accessible.
- Evaluation practices, which can strengthen planning and implementation as well as determine program effectiveness.

The ideas developed in resources such as these can provide guidance and checklists to strengthen inservice program planning in the overseas schools. Stateside educators have access to publications, conferences, and organizations (such as the National Staff Development Council and the National Council of States on Inservice Education) through which to share ideas concerning inservice education (such as those just summarized). Unfortunately, overseas/professional personnel remain very much isolated from these resources and experiences.

Key problem areas.--Key problems concerning inservice education stem both from the geographic dispersion and consequent isolation of the schools and also from funding difficulties. Problems include the following:

- Lack of clear budgeting for inservice needs and a policy to commit funds as budgeted. Increasing costs for items such as salaries and transportation have made inroads on funds originally intended for inservice education. The fiscal requirements of the new mandates in Public Law 95-561 have also led to reduction of funds needed for inservice training. This fiscal uncertainty has made planning for inservice education programs difficult.

- Susceptibility of the money budgeted to budget cuts due to unforseen and sudden increases in fixed operating costs. Additionally, foreign currency exchange fluctuations can quickly increase transportation, energy, and other support costs. The current funding procedure does not allow teachers, regional office, or headquarters staff to effectively plan significant inservice programs, nor does it allow universities and colleges or consultants to schedule appropriate courses.
- Severe DOD limitations on travel and per diem and ceilings imposed on overall travel prevent effective management of the 5-year curriculum plan at all levels and do not allow enough people to meet often enough to train them effectively for implementing new programs or maintaining ongoing ones.
- Remoteness of some overseas staff and duty stations from college and university training opportunities and the reluctance of universities and colleges to schedule courses under the current funding procedure, which makes it difficult for all parties (teachers and universities) to effectively commit their time. Also, many university and college courses are geared to the military and often do not meet the educational needs of overseas teachers.
- Wide geographic dispersal of schools and the relatively high staff turnover rate, which make program support and evaluation difficult.

ED resources.--While many ED programs have educational personnel development components to some degree or another, they are very distinct in terms of their specific goals and objectives and thus the linkages of these programs to the overseas school system will vary. The most likely and feasible means of developing some linkages between the overseas schools and these programs is through the auspices of ED's Office of Professional Development and Dissemination (OPDD), which has department-wide responsibility for coordinating all education personnel development programs. Opportunities for linkages with these offices will be actively pursued in the coming months.

Particular consideration of two teacher programs, Teacher Corps and Teacher Centers, will provide insight into current inservice trends and make inservice resources available to key decisionmakers and teachers. The teacher center program has been singled out as an exemplary model for any task force committed to developing successful programs to serve the identified needs of teachers and other educational personnel and to improve the quality of education.

Because of the unique nature of the overseas school system, OPDD in cooperation with ODS would probably have to take the following steps to support the coordination/linkage of those units having educational personnel development activities with the overseas school system:

- Determine the specific aspects of the units having educational personnel development components that lend themselves to linkages with the overseas school system. This is likely to result in sharing of research findings, curriculum materials, improved practices, procedures and processes, evaluation techniques, etc.
- Determine the most efficient and feasible means of disseminating effective procedures, practices, processes, and print materials.
- Develop policies, guidelines, and strategies for linkage/coordination activities.
- Develop an ongoing evaluation/monitoring system to determine the effectiveness of linkage activity.

ED programs with potential for linkage with DoDDS include the following:

- Office of Educational Research and Improvement (OERI)
- Office of Special Education and Rehabilitation Services (OSERS)
- Office of Bilingual Education and Minority Languages Affairs (OBEMLA)
- Office of Elementary and Secondary Education (OESE)
- Office of Postsecondary Education (OPE)

Conclusions.

- An inservice policy statement should be developed that includes (but is not limited to) a rationale and definition of inservice education, the degree to which inservice education is a matter of choice, and the respective responsibilities of the overseas school system and the individual educator.
- The overseas schools inservice coordinator and ED's Professional Development and Dissemination staff should meet to discuss long- and short-term plans for inservice education.
- A budget and accounting structure should be developed to identify inservice component costs and establish inservice as a major budget item. Such an item should be given a high priority in the budget for inservice education. This procedure compares favorably with

inservice budget procedures for schools in the United States and would provide for the systematic training specified in the Five-Year Curriculum Development Plan.

- Inservice education should be designed to support curriculum improvement as called for in the Five-Year Curriculum Development Plan. It should continue to support the professional development of overseas educators by maintaining or increasing the availability and variety of training options.

- The inservice education program should be designed so that it can serve the spectrum of needs assessed annually in each region, as well as respond to unanticipated events and areas of emphasis.

- Opportunity should be provided for teachers to participate in planning, designing, conducting, and evaluating inservice programs.

- Support should be given to inservice activities that involve the entire school faculty in developing programs for faculty and school improvement.

- A number of approaches to professional development should be implemented to permit regional and school-based personnel to keep abreast of new programs and methodologies, to pursue individual studies and research, and to improve instruction. Consideration should be given to Teacher Centers internship (such as those in Teacher Corps), exchange programs, and minigrants.

- An evaluation of the inservice program should be planned, budgeted for, and implemented to determine the effectiveness and future direction of the program.

- Existing restrictions in travel policies should be amended to permit travel necessary for an adequate inservice education program.

- ED's Office of Professional Development and Dissemination should provide coordination between educational personnel development programs and ODS in order to foster cooperation between the overseas school system and other Federal programs and to facilitate dissemination of exemplary professional development ideas and resources.

- The overseas school system should negotiate with universities that serve (or might serve) the overseas schools for graduate courses and programs comparable with identified inservice needs.

Pupil Personnel Services

DoDDS has requested additional pupil personnel services (PPS) personnel. At the present time there are 235 PPS staff on board. An increase to 317 would produce a pupil-teacher ratio of 1 to 425, about the same as that found in several school systems in the Washington, D.C., area. The number of counselors in DoDDS is comparable to that in some U.S. school districts. The number of psychologists and social workers presently on board is not adequate to meet the needs of the school system, particularly in providing diagnostic services for children requiring special education.

Research, Improvement, and Evaluation

Research and improvement.--Public elementary and secondary schools in the United States are embedded in a complex institutional structure that provides a wide variety of services aimed at improving educational practice. While some of the larger metropolitan school districts may approach self-sufficiency in this field, virtually all depend to some degree on outside resources. Services are provided by State and intermediate education agencies, higher education institutions, regional educational laboratories, and for-profit and not-for-profit private firms.

The following types of services are provided:

- Information services giving access to a retrieval of printed reports and descriptions of exemplary curriculum practices. Most agencies providing service are non-Federal and purchase materials from ED's ERIC system, which is a comprehensive data base covering the print literature in education. ED's National Diffusion Network (NDN) provides access to exemplary practices that have been validated by an expert review board at the Federal level. Many States have similar validation practices available to schools.
- Technical assistance, usually consisting of consultant services focused on solving educational problems in specific settings and provided by a wide variety of agencies. For example, regional service programs at regional educational laboratories provide technical assistance on locally identified problems, and a network of bilingual education service centers helps schools provide effective services to such populations.
- Professional development focused on the knowledge and skills required either by specific positions (e.g., elementary math teacher) or by certain kinds of organizations (e.g., elementary schools). Inservice education programs are provided by a variety of agencies, while preservice education occurs chiefly in schools of education. (Inservice education is discussed more fully in the preceding section.)

These services draw on an enormous base of educational products and processes resulting from a complex of local, State, and Federal research and development activities conducted by both public and private agencies. This may be seen by examination of the research and improvement activities available to Cimaron, Kans., a typical U.S. school district away from any large metropolitan area (see appendix G). Although Cimaron is in an area of Kansas in which the population is dispersed, it is embedded in a complex institutional structure that provides a wide variety of services aimed at improving educational practice. While many services are funded by Federal programs, many others receive State and other support. Even where Federal funding is involved, Federal delivery of the service is the exception rather than the rule.

In contrast to most U.S. school districts, the geographic isolation of the overseas schools and their isolation from the mainstream of U.S. education have removed almost all of the school system from access to practically all of the services resulting from the research and development activities in the United States. An exception is the extensive ERIC system maintained in Karlsruhe, West Germany.

The chief problem to be faced in relation to the delivery of research and school improvement services to the overseas school system is how to provide external support analogous to that found in the United States. There are several options to be considered.

- Adding the overseas schools to the client base of an existing agency service.
- Adding service provider units to existing service networks; e.g., placing ERIC collections and search services in other locations overseas.
- Creating and supporting new service organizations within the Department of Education analogous to those serving the public schools in the United States.
- Establishment of a regional laboratory as a part of ED's nationwide network of centers and laboratories that conducts education R & D activities on topics of general interest to the U.S. educational community and fulfills the R & D needs of specific regions of the country. A separate lab for DoDDS might address many research and improvement problems of the overseas schools system, which represents regional areas with a number of potentially unique research and development questions (e.g., total student turnover, sociopolitical operating context, and complex multilingual demands on students).

- Establishing a system enabling the overseas schools to have more direct access to information about the activities and products of the labs and centers and to formally coordinate the needs of the overseas schools with the expertise available in the lab/center network.

Evaluation.--The task force on research, improvement, and evaluation used two U.S. school districts as a basis for comparing the evaluation program of the overseas schools with activities in the United States. Although the districts were chosen on the basis of proximity and familiarity with the districts by task force members, both districts also seemed comparable in terms of the complexity and diversity of students and teachers, student mobility, efforts at parental involvement, linguistic and cultural heterogeneity, and the problems of managing a large system that is attempting to provide standardization and some measure of decentralization simultaneously. A basic skills measurement of student progress and reporting to parents, records management and transfer, and system assessment will have many characteristics in common when large and complex systems are involved. (The "Research, Improvement, and Evaluation Task Force Report" presents detailed information on the evaluation activities of these districts, which are very briefly summarized here.)

The Montgomery County Public Schools (Maryland) have an extensive program of pupil, teacher, and system evaluation. The program is designed and administered by the school system's Department of Educational Accountability. The department conducts pupil testing programs and analyzes data on system schools that enable it to produce two major reports each year for system staff and for the public. The Annual Test Report documents and analyzes the current cycle of systemwide testing on a school-by-school basis as well as for the county as a whole. The second major report, Statistical Profile, provides information about schools and their administration on a school-by-school and office-by-office basis. It focuses on student characteristics and enrollment data, staff characteristics and allocations, and general information. Student data include enrollment totals and minority distribution of student populations.

Parents have various reports available to them. The Department reports to parents on student performance on the Iowa Tests of Basic Skills (ITBS), the Cognitive Abilities Tests (CAT), and the Maryland Functional Reading Tests (MFRT). Each school sends an Annual School Report to its community in the fall. The Montgomery County School system publishes a weekly Bulletin with information on system and school activities. The board of education occasionally prepares Policy Statements on a wide range of school-related subjects. Finally, the school system publishes from time to time Executive Summaries on selected evaluation studies or analyses.

The Washington, D.C., Public Schools have an extensive program of data management and pupil assessment. The Division of Research, Planning, and Evaluation in the immediate Office of the Superintendent of Schools administers this program. Beginning with the 1978-79 school year, the Washington, D.C., schools moved to a competency-based curriculum. A central feature is the use of specific behavioral objectives for which criterion levels of performance have been established.

The Division has also developed the Evaluation Data Acquisition, Control, and Analysis System (EDACA) as a computer-based data acquisition, storage, and processing system. The EDACA system is designed as a base for program planning and resource allocation. The pilot phase has involved 14,318 students from 562 classes in grades 1 through 6 in 34 schools. The system is supposed to be highly standardized, yet flexible enough to permit addition of schools, classes, and students.

In pupil assessment, systemwide targets were set for student achievement in the 1978-79 school year, with a testing program as the basis of measure that included the following:

- The California Test of Basic Skills in reading and math for grades 3, 6, and 9.
- A Criterion-Referenced Test in reading and math for grades 1 through 9.
- The Everyday Skills Test (criterion-referenced tests for reading and math skills considered necessary for everyday living) for grade 11.
- The California Achievement Test for Adults or the Basic Learning Exam for students in the adult and continuing education program.
- The Differential Aptitude Career Planning Program (which includes eight differential aptitude tests and a career planning questionnaire) for grade 8.
- Measurement of special education students against each child's Individualized Education Program (IEP).

While ODS has developed a systemwide evaluation framework for both program and pupil assessment, it is not as extensive as the programs described for the two stateside school systems. A notable difference from the overseas schools exists in the development of extensive data banks in both stateside systems, in the formalized processes for using data in program planning and resource allocation, and in the comprehensive, frequent reporting of evaluation results to constituents.

Administration.--Formal school district evaluation is a relatively recent and growing field. Most evaluation offices were organized in the seventies. Some also handle research and improvement activities. A recent survey of U.S. school district evaluation, published by the Center for the Study of Evaluation in 1978, yielded some information useful for comparative purposes. It showed that by 1978 only 43 percent of the larger school districts (enrolling 10,000 or more students) had an evaluation unit. In establishing an evaluation unit, DoDDS has been in the forefront of developments in the evaluation field.

Due to frequent interface with large-scale State and Federal assessment efforts, most evaluation offices in U.S. public school systems are responsible for, but not exclusively in charge of, assessment activities in the schools. As their major data collecting activity, these offices are concerned primarily with student achievement and testing. In contrast, the DoDDS evaluation unit does not participate in State and Federal assessment activities, and, as part of the DoDDS 5-year curriculum review process, is involved in ongoing program assessment. The evaluation unit uses testing, as well as other means, for data collecting. The number of persons in the evaluation section (including headquarters and regional offices) is adequate to perform both pupil assessment and program evaluation functions, but the number is inadequate to conduct research and improvement activities as well.

Typically, a small proportion (about 1 percent) of a local school district's budget is allocated to its central evaluation office. This is offset by the addition of State and Federal funds, which account for 33 percent of the total budget for the local offices. In DoDDS, evaluation activities receive far less than 1 percent of the total budget, ranking the system's evaluation effort below the average of most U.S. school districts. For FY 1981, DoDDS spent $707,034 on pupil and program evaluation activities, including NCA costs, as against $22,000 for research and improvement. This is consistent with stateside evaluation office budgets, which spend 41 percent on evaluation and 27 percent on testing, with the remainder devoted to various research and improvement activities.

In summary, evaluation activities are conducted in DoDDS within a sound conceptual framework, but suffer from limited scope, insufficient funding, and lack of an extensive data base, detailed reporting procedures, and workable procedures for funneling information into program planning and resource allocation activities.

ED resources.--The Department of Education can provide assistance in evaluation and school improvement practices in a number of ways. These opportunities will be actively pursued in the coming months. The evaluation section of the Office of Educational Research and Improvement has used a variety of evaluation practices in all programmatic areas. In addition, specific ED activities related to program improvement and student record keeping have been identified.

- Basic Skills Coordination System: Nearly 30 ED programs with basic skills components exchange information and coordination activities through the Basic Skills Steering committee. This network also encourages, identifies, and disseminates effective practices in basic skills coordination at the State level. This type of organizational activity, one conducted at the State level, may be of particular relevance to the overseas school system.

- Basic Skills Validation and Marketing Program: An effort to assist basic skills projects that are potentially qualified for national dissemination and to arrange for commercial distribution of basic skills education products under contract to LINC Resources, Inc. of Columbia, Ohio, and the Network, Inc. of Andover, Mass.

- Joint Dissemination Review Panel (JDRP): ED's quality control unit for programs, projects, practices, or products claimed to be successful, effective, "promising," etc. JDRP approval is necessary for grant support by the National Diffusion Network (NDN) for disseminating effective activities.

- National Diffusion Network (NDN): A nationwide system established to assist local school districts to improve their educational programs through adopting or adapting already developed, rigorously evaluated, exemplary educational programs. The NDN has two main purposes:

    - To build and maintain a national system for delivering an increasing variety of successful educational projects to meet the needs of local school districts at a fraction of the original development cost.

    - To assure that successful educational projects developed in one State are made available for consideration by school districts in all States.

- Migrant Student Record Tracking System (MSRTS): A computerized student tracking system that tracks approximately 665,000 identified migrant children in the United States. Primarily health and achievement test data are recorded through use of a main computer in Arkansas and 170 terminals throughout the United States. This system might be applicable to the record transfer problem in the overseas schools.

- Research and Development Centers and Regional Educational Laboratories: Discussed earlier in this section.

In summary, the overseas dependents school system has not had access to the variety of research and improvement activities available to school systems in the United States and does not have a systematic process for disseminating information among its schools about improved education practices recently developed either in its own schools or in schools in the United States. Furthermore, efforts to fund such activities internally have met with limited success.

Conclusions.

- The overseas school system should create and maintain a student data bank that would be a computer-based data acquisition, storage, and processing system. The data bank could be regionally based but would have systemwide characteristics. Data collected would provide a base for educational planning and resource allocation. Design considerations would have at least these objectives:
  - To enter information on each child's educational and health background, status, and needs into the data bank before or during the child's enrollment in the system.
  - To provide each child's record from the data bank to the child's next school, whether elsewhere in the overseas school system or in the United States, before the child arrives at that school.
  - To prepare longitudinal studies of selected students or groups of students based on the unique identification number for each student in the system.
  - To make systemwide and regional assessments to contribute to major system evaluations and to annual mandated reports.
- The Migrant Student Record Tracking System should be examined for its applicability to the records transfer problem within the overseas system. The objective would be to ensure that a child's educational and health record arrives at a new school either overseas or back in the United States before the child arrives at the school. The new Skills Inventory System (SIS) activity should also be examined for its applicability to a large-scale pupil tracking system based on a continuum of skills from preschool through grade 9.
- A standard report form should be developed for use in reporting to parents throughout the system. The report form should be designed to provide appropriate information on student needs and progress and should be as similar in format as is convenient to that provided by the central student data bank. Consequently, administrators and teachers anywhere in the United States whose schools are frequent "receivers" of students returning from abroad would know the kinds of information that parents

have been routinely receiving while their child was in the system. In case of a breakdown in transmission of student records from the data bank to a receiving school, a parent could provide recent report forms as an immediately recognizable and usable aid to rapid placement of the student in the new school.

- A report on the general characteristics of the student population, a detailed description of programs and where they are located, a faculty profile, and a detailed budget should be published and disseminated annually.
- Provision should be made to gain greater access to products related to educational R & D efforts that deal with specific research and improvement questions in the overseas schools.
- Central headquarters staff should participate in ED's Basic Skills Steering Committee and apply whatever pertinent information emerges from State and local efforts to coordinate basic skill instruction. Effective practices or materials developed at the State or local level may be applicable at the regional or national level in the overseas system.
- Central headquarters should monitor activities under ED's Basic Skills Improvement Program and keep informed about the projects and products identified through it. It should promptly disseminate basic skills projects or projects appropriate to the overseas system at the local, regional, or national level.
- Exemplary practices and materials developed within the overseas system should be submitted to ED's Joint Dissemination Review Panel (JDRP). JDRP approval should lead to dissemination within the system itself and, via the National Diffusion Network and other ED dissemination mechanisms, to dissemination outside the overseas system.
- A system should be developed that is similar to the National Diffusion Network's use of State facilitators within each region. The regional facilitator working with an internally funded minigrant system could spur local school program development efforts and assist in disseminating effective programs within and across regions.
- Data on the overseas schools should be included in all appropriate data collection activities performed by ED's National Center for Educational Statistics.

Title XIV Programs

Compensatory Education

In the 50 States, almost all compensatory education programs receive funds under the Elementary and Secondary Education Act (ESEA), title I. Title I is a federally funded, formula grant, compensatory education program. Its primary goal is to improve the educational attainment of educationally deprived children who live in school attendance areas with a high concentration of low-income families. Funds made available through title I are to be used to provide more effective supplementary programs of instruction, especially in the basic skills of reading, writing, and mathematics, in order to meet the special educational needs of educationally deprived children. Although title I services are available only in low-income areas, the children living in a project area are chosen solely on the basis of educational need.

Because the overseas school system is not expressly made subject to the provisions of title I and is not eligible to receive title I appropriations, it is not bound by the requirements of the law. Nevertheless, it seems reasonable that the overseas schools would look at the requirements in title I for general guidance concerning those features of a compensatory education program that the Congress felt were important. The analysis that follows, therefore, examines the DoDDS compensatory education guidelines in light of applicable title I requirements.

General comparison with title I programs.--ED estimates that about 9 million elementary and secondary children in public and private schools in the United States need compensatory education. This represents about 17 percent of all school-age children in the country. As previously noted, application of the 17 percent figure to the estimated 133,000 student population for 1981-82 yields an estimated compensatory education student population of about 22,600. DoDDS states that it will serve about 23.2 percent of this estimate (or 5,250 students) in school year 1981-82.

Title I programs are staffed by 97,772 teachers, 18,440 other professionals, and 104,286 educational aides. The programs serve about 5,335,000 children, or 61.5 percent of those requiring service. The gross pupil/teacher ratio is about 55:1. DoDDS programs are presently staffed by 30 teachers (many of whom have other responsibilities) and 66 paraprofessionals, with a gross pupil/teacher ratio of 137:1. The average per pupil expenditure in title I programs is $455, and in DoDDS it was $387 in school year 1980-81.

Program comparisons.--DoDDS has recently developed a draft of program guidelines that are to be implemented in school year 1981-82. A comparison of the title I requirements and the DoDDS draft program guidelines follows.

- Needs assessment: Under title I, a needs assessment is done each year to identify children with the "greatest need," to identify instruction areas on which the program should focus, and to determine needs of the children sufficiently to develop a high quality program.

  DoDDS conducted a needs assessment on 1st and 2nd graders in the target schools to determine their eligibility for the program. That assessment was based on teacher judgment and students' scores in the California Achievement Test and the Metropolitan Reading Test and on below-level grade placement in their basal readers. In the future the needs assessment is to be done on all students once a year for the next 3 years.

- Designated schools: Schools eligible for title I programs must be located in areas with high concentrations of children from low-income families. Schools may also be ranked according to the severity of education deprivation.

  DoDDS target schools are selected on the basis of students' low Basic Skills Aptitude Test scores, staffing needs, size of school, and number of available resource persons.

- Local program application/project plan: A local education agency must develop an application describing programs and projects to be conducted.

  A DoDDS school that has been designated as a target or eligible school is required to establish a school-based planning committee to prepare a project plan for meeting the needs of its compensatory education students. The plan is to be submitted to ODS for final approval.

- Teacher and school board participation: Title I requires that teachers and school boards or comparable groups should be involved in planning and evaluating programs.

  DoDDS parents, teachers, and regional office staff are to participate in developing school-based plans. No provision has as yet been made for participation by the local school advisory committee, but such participation is anticipated with the establishment of local school advisory committees.

- Parent participation: Title I requires that the parents of children served must participate in designing programs, making recommendations concerning program goals, and assisting their children in achieving those goals. Furthermore, advisory councils are established composed of a majority of parents whose children are served in the projects. Members elected by school district parents include representatives of the children and schools eligible to be served.

With the initiation of the target school concept in FY 1982, DoDDS parents are expected to participate in their children's educational program. The establishment of school advisory committees and the Advisory Council on Dependents Education is expected to provide specific parent participation at the local and national levels.

- Individualized education plan: Title I encourages but does not mandate an individualized education plan for each student agreed upon by the school, teacher, parent, and child, when appropriate.

  DoDDS also encourages parent participation in the educational experience of their children, but individualized education plans are not a regular component of the compensatory education program.

- Funding: Title I funds are allocated to school districts on the basis of the number and needs of the children to be served.

  In DoDDS, over the next 5 years funds are to be allocated on a per pupil basis to the target schools, with an additional allocation for materials and equipment to initiate the program. After that, when the full complement of staff is in place, DoDDS funding is to be made on the basis of the needs of the total number of students in the system.

- Compensatory education training: Title I programs must provide opportunities for aides and professional staff to participate in training together.

  DoDDS guidelines also provide that staff and aides should train together.

- Evaluation: Title I requires adoption of effective evaluation procedures.

  In the 1-1/2 years of its operation, DoDDS has not conducted a program evaluation per se, but only a count of teachers and programs for compensatory education. Evaluation for the purpose of program development has not been conducted so far but is called for in the guidelines.

- Complaint resolution: Title I states that opportunities for written procedures for the resolution of complaints by parents, teachers, and others should be made available to the general public.

  At the present time, the DoDDS compensatory education program does not have a specific complaint procedure. However, DoDDS is cognizant of the need to provide a systematic procedure for parents and teachers to voice their concerns. This is evidenced in the current complaint procedure regulations of Public Law 94-142.

- Reporting procedures: Title I requires that an annual report relative to student performance and success of program objectives should be made, and that all documents relating to the program should be available to parents, teachers, and the general public.

  DoDDS guidelines are to provide for similar reporting procedures.

DoDDS has indicated some uncertainty concerning precise congressional intent with respect to compensatory education in the overseas schools, but it intends to pattern its compensatory education program after those title I requirements that are applicable to it. Although the DoDDS compensatory education program, being in its beginning phase, has not yet met all the applicable title I requirements, ODS has indicated that its guidelines, soon to be available, will address a broad range of the requirements and aspects of the title I program.

Conclusions.--The Congress passed compensatory education legislation in ESEA title I in order to provide additional assistance to children living in the lowest income areas in the United States. Comparable living conditions and social learning environments, however, do not exist for persons serving the military overseas. The Congress apparently included compensatory education as one of the program areas to receive special attention in Public Law 95-561, title XIV because it is committed to providing children overseas with educational opportunities equal to those available in the United States. There is no legislative history to shed further light on congressional intent in regard to compensatory education. Although additional educational compensatory education assistance may indeed be needed for a large segment of the overseas population, the title I framework may not be the most appropriate. Some of the title I criteria, particularly those dealing with economic deprivation, do not apply to DoDDS students. However, the target school approach developed by DoDDS retains the essence of the compensatory education goals defined by programs in the United States. The following conclusions have been reached in light of the foregoing discussion:

- The draft compensatory education guidelines should be completed as soon as possible and distributed to all regions for use in program development.

- A very comprehensive assessment of the overseas schools population should be conducted to determine precise needs for compensatory education in every school. On the basis of this assessment, a program should be planned and phased in that is responsive to the compensatory education problems not just in target schools but in all schools.

- Funding and staffing should be increased to a level that permits adequate support to target school programs. Further funding and staffing should be phased in to meet the compensatory education needs of students in all schools.

- The technical assistance available in a number of ED offices should be utilized in developing and delivering compensatory education programs.

- With adequate funding for compensatory education provided in the total overseas dependents schools budget, the Congress should remove the overseas schools from eligibility for appropriations authorized presently under Public Law 95-561, title IV, section 403(c).

Education for the Gifted/Talented

Students.--ED's Office of Gifted/Talented reports that a survey of State services in 1979 showed that most States estimated the incidence of gifted/talented students between 3 and 5 percent, with several as high as 10 percent. The percentage of the estimated gifted/talented students actually served ranged from 2 percent to 100 percent, with an average of 50 percent receiving service.

DoDDS does not have accurate data on the number of gifted/talented students or on the number being served. Furthermore, the definition of "service" varies from region to region, with some teachers providing only consultative services and others working full-time with small groups of children.

Teachers.--There are no data on the national pupil/teacher ratio in this field, but in 10 States the minimum number of students allowed in a self-contained classroom ranges from 20 to 27, and the average number of gifted/talented students served by one teacher, not necessarily on a daily basis, is 61.

Although the DoDDS staffing criteria merely state that staffing for gifted/talented "is determined by the regional director as students are identified and programs are developed," a ratio of only nine gifted/talented teachers for 270 schools is clearly below minimal needs in a system of this size and below accepted practice in U.S. schools. Furthermore, the distribution of its minimal services is inconsistent with the population distribution, because 58 percent of the student population is in the two Germany regions, which have only two of the nine teachers.

Program.--According to a 1980 survey by the Council for Exceptional Children, 39 States have legislation describing programs for the gifted/talented and 44 States have regulations describing procedures for screening and identifying gifted/talented children. Furthermore, a variety of service-delivery systems is in effect throughout the United States, including special schools, special classrooms, resource rooms, and itinerant services.

In DoDDS, all the current teachers of the gifted/talented have requested that a more extensive plan for the gifted/talented in the school system be written than the 1979 plan. Regarding types of service offered, the present lack of staff in DoDDS and the burden on the existing nine teachers have severely limited opportunities not only for providing the types of service available in the United States but for exploring special opportunities available for gifted/talented students in the host nation setting.

Funding.--Nationwide funding for the gifted/talented has been low. In 1980, the Federal Government appropriated $6.28 million and the 50 States increased the funding to $117 million to reach an estimated 35 percent of gifted/talented students. (States reimburse local school districts for the costs of educating gifted/talented students through a variety of funding formulas.) The current cost of educating a gifted/talented student (actual money spent, not cost of a complete program) is computed at 1.14 x the cost of educating an average student in a school system.

In contrast, the DoDDS commitment remains low, residing primarily in the Public Law 95-561 legislation that has yet to be translated into resources and action. Also, as previously noted, the overseas schools have not been able to request funding under title IX.

ED resources.--There are a number of opportunities for linkages with ED's Office of Gifted/Talented that will be actively pursued in the coming months. The Office has extended technical assistance that could be provided on a permanent basis to help ODS draft a systemwide plan for educating the gifted/talented. The plan would include a statement of purpose; a definition; the results of a systemwide needs assessment; teacher qualifications; program options; procedures for identifying, evaluating, and placing gifted/talented students; a staff development plan; and a mechanism for funding from DoDDS headquarters to regions and local schools.

Other resources.--There are a number of international and national programs available to develop the potential of gifted/talented students. Among these are the International Baccalaureate program, which provides a degree for high school students based on an advanced curriculum, and the Presidential Scholars program, which provides for the selection of students from U.S. citizens living abroad to receive a $1,000 cash award and a Presidential Medallion and to participate in a 4-day seminar in Washington, D.C. Gifted/talented students need a variety of program options, and these are only two of many programs that could be explored through organizations devoted to the gifted/talented.

The overseas setting of DoDDS also provides special opportunities for developing programs for the gifted/talented. To develop the procedures for using the overseas environment, educators in the overseas school system should work with host nation teachers and other educators involved with gifted/talented programs. The first step would be to identify the potential in the host nation community for providing (1) mentors to relate individually with selected students; (2) opportunities for enrichment experiences; (3) opportunities for pairing host nation gifted/talented students with U.S. dependent counterparts; (4) opportunities for temporary exchange-living experiences with host nation families and gifted/talented students; and (5) contacts with community service agencies located in the host nation but with international ties (e.g., International Rotary, Kiwanis, Lions, Shriners, and Chamber of Commerce).

Conclusions.

- The overseas school system should develop a systemwide plan for educating the gifted/talented, with particular attention to developing comprehensive program procedures, establishing linkages with other programs through the Five-Year Curriculum Development Plan, and developing a budgeting process that allows for maximum development of the program.
- The overseas school system should develop procedures for systematically using the host nation environment in a program for gifted/talented students.
- The overseas school system should participate in the international and national programs that enhance the education of gifted/talented students (e.g., the International Baccalaureate Program and the Presidential Scholars program).
- The overseas school system should participate in the annual International Conference on Gifted/Talented.
- With adequate funding for gifted/talented programs provided in the total overseas dependents schools budget, the Congress should remove the overseas schools from eligibility for appropriations authorized presently under Public Law 95-561, title IX, section 906.

Education for the Handicapped

Comparison with program requirements of Public Law 94-142.--Since 1975, schools in the United States have been attempting to comply with the provisions of Public Law 94-142. The compliance of the overseas schools in comparison with that of schools in the United States may best be seen by considering some of the State plan's program requirements previously discussed.

For identification, location, and evaluation of all handicapped children, the State plan uses information submitted from the local education agencies in the form of applications for State and Federal money. Documents from both the local and State agencies provide detailed information on the number and kinds of children to be served and the allocation of resources. The Second Annual Report to Congress on the Implementation of Public Law 94-142 (1980) reports that program administrative reviews conducted in 21 States had documented procedures for an accurate child count. Both State plans and local agency applications are developed with strong requirements for public participation. At the State level, hearings are conducted on the context of the plan, and the State Advisory Panel also comments on the plan. A large component of the plan details the management of Federal and State funds and describes a system for monitoring compliance within the State.

The current written guidance published by DoDDS differs from the annual program plans required from the States in that it is not in the form of a program planning and monitoring document. The written guidance does not detail the population to be served or the resources required or programed, nor does it provide for a system of internal monitoring procedures. The guidance only outlines general policy and operating procedures, and public participation guidelines in Public Law 94-142 are not followed. However, an initial draft of regulations developed by ED's Office of Special Education and Rehabilitative Services (OSERS) in conjunction with DoDDS was considered by the Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents and has been given to the DOD General Counsel.

Concerning the requirement that an Individualized Education Program be developed for each handicapped child in cooperation with the parents, many school districts in the United States have adopted more formalized, comprehensive, and structured assessment procedures. Although they have procedures in place to involve parents in pupil planning and programing, more effective promotion of the procedures is needed. Only about half of the IEP meetings are attended by parents, and the parent role in decisionmaking is often limited to a passive one.

DoDDS has established assessment procedures and created the opportunity for parents to be formally involved in the IEP process. In these respects, the program is comparable to that of schools in the United States. No data are available on DoDDS implementation or the effectiveness of the procedures.

The least restrictive environment provision has been a major focus of the States, according to a review of 1978 annual program plans. The plans contain policy statements on the least restrictive environment, descriptions of a continuum of services, and often prioritized considerations for placement. In school districts examined by OSERS during school year 1978-79, more children were receiving service in the regular classroom, and school districts had expanded placement options. The increased number of handicapped children receiving services in the classroom may reflect an increase in the number of mildly handicapped children served rather than a shift in placement policy. Services have been increased particularly for the preschool handicapped and the secondary mildly handicapped student.

The majority of children in the DoDDS system are receiving services in the regular classroom, partly because of the policy of the armed services to consider other options for the assignment of persons with severely handicapped dependents. It also reflects a concerted effort, beginning in the early seventies, to abolish segregated classes for mildly handicapped children.

Related services were being received by approximately 13 percent of handicapped children according to the Second Annual Report (mentioned earlier). (Speech was considered special education rather than a related service.) Types of related services cited were transportation, medical services (usually visual examination and diagnostic services), counseling, psychological services, occupational therapy, social work, audiology, and parent counseling. Of these, transportation was the most frequently provided service. The Second Annual Report to Congress also states that the number of children in the United States receiving related services may be lower than those needing the services. Related services listed in the IEP may reflect only what is available.

Both the DoDDS system and the military services are understaffed with persons able to provide related services. The only exception is school counselors, many of whom are not trained to administer psychological tests or to provide intensive therapy. The military departments, ODS, and particularly parents and teachers have identified a lack of any formal agreements at local, regional, and systemwide levels between the military departments and DoDDS on their respective responsibility for providing related services. No data exist on the number of children in the DoDDS system needing or receiving related services.

The Department of Defense, Office of Health Affairs has stated that "with regard to related services, it shall be the responsibility of the Department of Defense to provide those services which require professional medical supervision. In general, those services which are diagnostic and therapeutic in nature will be provided to the school system by the appropriate service medical department."

In the program area of personnel development, during school year 1978-79 all the 21 States reviewed by OSERS had a comprehensive system and the remaining States were in various stages of initiating a system. These comprehensive systems address both preservice and inservice training and rely on the vast resources for higher education in the United States to realize personnel development goals.

In DoDDS there is no systematic plan of personnel development, nor is a wide variety of training available comparable to that found in the United States. DoDDS has relied on a five-university consortium to develop and deliver training in education for the handicapped in various regions on a contract basis.

The issue of private schooling for children requiring special education is not addressed in the 1980 report to the Congress. Public Law 94-142 mandates that a free, appropriate education be provided to all handicapped children. When a school system cannot provide special education to a particular child within the public sector, tuition must be paid by that system to a private school. However, the school system must make every effort to provide the education within the public schools. Data gathered for the report demonstrate that school systems are providing a more extensive continuum of services and that a larger percentage of children are educated within regular classes, perhaps indicating a reduction in the number of children educated in private schools.

The geographic spread of the DoDDS population inhibits to some extent the development of a continuum of services within the system. In order to comply with Public Law 94-142, DoDDS needs to develop a comprehensive set of policies and regulations concerning private school tuition reimbursement for handicapped children. DoDDS faces a number of problems in attempting to place children in private schools overseas because (1) DoDDS has little leverage over private schools in a host nation, which have no compelling reason to implement the IEP, due process procedures, or any condition addressed in a U.S. law; (2) appropriate schools are often located at a great distance from the child's family; and (3) school settings often do not match the U.S. experience in any way. Using private schools in the United States also presents problems in separating children from their families and in ensuring that they receive a high quality of education.

In regard to procedural safeguards, all 21 States visited by OSERS during school year 1978-79 either had laws and regulations consistent with relevant Public Law 94-142 provisions or were in the process of revising their laws to make them so. Although due process hearings have been held in most States, a few States are still implementing this provision.

Due to the complex set of requirements imposed by Public Law 94-142, the Congress has mandated a system of independent review of State and local activities in implementing the law. This independent review, conducted by State and Federal agencies, constitutes a comprehensive system of checks and balances to examine and ensure the compliance of school systems in the United States with P.L. 94-142. Part of the independent review process involves the requirement that ED review and approve State plans as well as conduct Program Administration Reviews of State programs, including visits to many local sites. As another aspect of the review process, each State develops provisions for monitoring the activities of local education agencies. Finally, the Congress holds regular oversight hearings on Public Law 94-142 and requires an annual report from ED on implementation of the law.

Responsibility for ensuring that the requirements of Public Law 94-142 concerning compliance, monitoring, and enforcement are carried out by the DoDDS system rests with the Secretary of Defense as part of the broad responsibility for establishing and operating the DoDDS system. However, no independent DOD unit has been designated to carry out an oversight function, nor is any agency outside DOD required to review and report on Public Law 94-142 implementation in the overseas schools.

In the past, there have been no extensive procedural safeguards available to parents within the DoDDS system. Once the minimal procedures described in DS Manual 2500.4 have been exhausted, it has been the pattern for individual parents to appeal to the Congress and recently to the courts. This process is not comparable to the system of checks and balances operating for all other U.S. school systems. It does not appear to be the most effective means of protecting the rights of handicapped children overseas, and it is burdensome for the individual parent.

Three options have been considered by ED to remedy the situation after the transfer of the overseas schools:

- Option #1: The Congress might exercise oversight responsibility for enforcing Public Law 94-142 through the General Accounting Office (GAO). The Congress already has the power to enforce compliance with Public Law 94-142 in the budgetary process, although the procedures for withholding money to ensure compliance with this law are not clearly delineated. Also, this option would extend and regularize a relationship that already exists, since the GAO not only is organized to conduct reviews overseas but has already reviewed various components of the overseas program, including special education.
- Option #2: OSERS might monitor the overseas schools' compliance with Public Law 94-142. OSERS would advise the Administrator and the Secretary of Education on the extent to which the overseas schools are complying with the law's policies and programmatic procedures. This option would give a separate unit some responsibility for monitoring activities but would not provide any further means of ensuring enforcement.
- Option #3: Legislation would be proposed amending Public Law 94-142 to declare the overseas schools a State education agency for the purposes of the act and to provide funds equal to 1 percent of the funds available. The overseas school system would then be required to prepare a plan for providing services required under the act. This option would bring the overseas schools under the same system of checks and balances as other U.S. school systems under Public Law 94-142. It

would take advantage of procedures and expertise available in OSERS specifically to enforce this law. Its disadvantage is the difficulty and time involved in the process of proposing, submitting, and passing new legislation.

Option two appears to be the most efficient and expedient method of providing oversight.

A unique aspect of the DoDDS system is the need to provide special education to handicapped children on arrival at any of the numerous, dispersed overseas locations. As the entire pupil population is mobile and has a fairly rapid turnover, it is difficult to develop on-site services for children as needs are identified. A major element of the policy of the DoDDS system has been to locate many services geographically in areas where population density would indicate the continued existence of a sizable percentage of the handicapped population. This practice has been helpful in long-range planning and deployment of resources to ensure quality education programs.

The military parent of a handicapped child is faced with two regulatory processes relating to overseas assignments. Each of the military services has in operation policies and regulations governing the assignment of parents with handicapped dependents. Also, the overseas schools, subject to Public Law 94-142, must guarantee parents the right to be involved in determining the educability and subsequent program and placement for their handicapped children.

The difficulties inherent in attempting to implement assignments procedures and guarantee parental rights related to the education of their handicapped children have been considerable for children, parents, teachers, principals, and military medical and assignments personnel. Some of these difficulties, particularly those concerned with identifying handicapped children and their needs before overseas assignments, were described in a GAO report submitted to the Secretary of Defense in December 1978. As a result of this report, Army regulations detailing procedures for overseas assignments of persons with handicapped children were revised in an attempt to more accurately identify and describe handicapping conditions prior to overseas assignment.

Resources in ED.--In developing its recommendations, the task force found the assistance of ED personnel very valuable. Opportunities for using their expertise will be actively pursued in the coming months.

- Technical assistance can be obtained from the Office of Special Education and Rehabilitation Services, the Office of General Counsel, and the Office for Civil Rights. A base has been established for continued technical assistance to the overseas schools in providing an education for the handicapped. Persons in these offices are involved daily in assisting States and local school systems resolve special education issues.

The technical assistance resources within ED are broad in that they deal with problems in all 50 States and deep in that they reflect the struggle to provide equal opportunity for the handicapped over the last decade.

- OSERS can exercise an oversight function in regard to Public Law 94-142. The overseas school system is the only U.S. school system that is not subject to oversight by OSERS in regard to providing an equal education for the handicapped. OSERS is the primary agency with the technical knowledge necessary to oversee the implementation of Public Law 94-142.

Conclusions.

- An extensive student data bank should be created. Data should be maintained on the number of (1) students with various types of handicapping conditions found in the overseas population from birth up to 21 years of age; (2) referrals for service; (3) evaluations conducted; (4) IEP's developed; (5) children served and unserved; and (6) children requiring and receiving related services. Data should also be gathered on the environment in which special education and related services are provided. (DOD has made a commitment to collect information on the number and kinds of handicapping conditions found overseas.) The data should be used as a basis for program planning and monitoring.

- A program-based budget should be developed that would detail planned obligations and monitor expenditures, thus making it possible to manage and monitor education for the handicapped in compliance with Public Law 94-142.

- Community participation in planning for the education of the handicapped should be increased at local, regional, and systemwide levels. Development of program-planning and implementation documents similar to State plans would be useful as a mechanism for more school community participation and as a base for monitoring compliance.

- A comprehensive system of personnel training in the skills and procedures necessary to comply with Public Law 94-142 should be developed and implemented.

- A formal written agreement detailing the services to be provided should be negotiated between the overseas schools and the military departments that provide related services to students in the overseas schools.

- An administrative agreement should be negotiated between the overseas school system and the Office of Special Education and Rehabilitative Services requiring the latter to exercise oversight functions concerning implementation of Public Law 94-142 by the overseas school system. OSERS would report to the Administrator and the Secretary of

Education on the status of compliance with the act by the overseas schools, with recommendations for administrative action to remedy deficiencies.

- The legal implications and relationships of current military assignments procedures as they affect equality of education for handicapped individuals should be thoroughly examined. (This recommendation is based on the experiences of task force members, a 1978 report by the GAO, and numerous complaints and congressional inquiries.)
- Regulations governing the compliance of the overseas schools with Public Law 94-142 should be published as soon as possible and public comments solicited.

Education for Individuals of Limited English-Speaking Ability

Planning and program.--As stated earlier, there is at present no systemwide plan for the DoDDS program for LES students. Individual schools organize programs at their own discretion or, in some cases, regional offices provide some direction. Priority should be given to developing a systemwide plan for meeting the needs of LES students through ESL and bilingual programs. With respect to the bilingual approach, the statutes of some 31 States specifically permit bilingual education programs.

LES students in the United States are served by a variety of programs that encompass an array of designs. In some schools, ESL instruction is given on a pull-out basis, which means that students go to the ESL teachers in a designated classroom for about 1 hour a day for instruction, which usually concentrates on language arts skills. Other forms are assigning students to the ESL classroom on a full-time basis and organizing instruction in conjunction with the regular school curriculum.

Transitional bilingual programs also come in many different forms. In self-contained programs, students remain in the same classroom for the entire academic day, receiving formal instruction from the same bilingual teacher via the language in which they are most proficient, as well as developing second-language concepts, fluency, and literacy skills. In team-teaching bilingual program designs, students receive instruction in two languages from two teachers (of whom at least one is bilingual), who are generally present at the same time within the same classroom. In magnet-center bilingual programs, students from the same language background are drawn from various classrooms from one or more attendance centers for a portion of the day. In departmentalized bilingual programs, students receive instruction in content areas in their first language in addition to English language arts.

Designing programs that will provide a high quality education for individuals of limited English-speaking ability does not entail making an either/or choice between the English-as-a-second-language approach and bilingual education, because these approaches are not mutually exclusive. Clearly, instruction to improve English-language proficiency is an essential component of both ESL and bilingual education programs.

Identifying and assessing LES students.--Limited English-speaking (LES) students in the DoDDS system have not been adequately identified and assessed in the past. There is an immediate need, therefore, to develop uniform assessment procedures to identify and place LES students in appropriate programs.

In many stateside schools, new enrollees are assessed in a cursory manner for potential language problems by simply having them indicate the number of foreign languages spoken in the home. This information may lead to further contact with the family and a more exact determination of any English-language deficiencies. In one school system with ESL programs in the Washington, D.C., area, all new students are screened at a central intake center, and all those who are diagnosed as needing ESL services are placed in an ESL classroom within 48 hours of initial registration in the schools.

Teachers.--A great deal of variation exists in the training that teachers of LES students in the DoDDS system have received. Some are trained and certified ESL teachers, while others have received only some inservice training to help them deal with LES students. Still others are English teachers, language arts teachers, or teachers of still other disciplines who have taken on this additional role, often without adequate preparation.

In the United States, training and certification requirements for ESL and bilingual teachers vary from State to State. Some States have already developed standards, while others are in the process of doing so. In most States, an ESL teacher must have at least completed several ESL courses or have a diploma or a major in ESL or bilingual education, in addition to the regular elementary or secondary school teaching certificate.

Exit criteria.--No adequate measure has been developed to determine when an LES student is able to successfully attend classes with English as the medium of instruction. Some stateside schools use the California Achievement Test and mainstream students who receive at least a 40 percent score. An additional appraisal of the students' ability is done by the bilingual or ESL teacher and the regular classroom teacher on a periodic basis. DoDDS criteria are based on teacher judgment and sometimes also on various standardized tests.

Materials.--Since the materials used by DoDDS classes for LES students were selected when the program began in 1976-77, those currently being used may be inappropriate or inadequate. Although supplementary materials have been selected recently for use at the regional level, a systemwide comprehensive review of all materials used in programs for LES students would be desirable at this time in order to identify and obtain a full range of appropriate materials for teaching students with limited ability in the use of English. Formal review of the ESL program as part of the 5-year curriculum review cycle is not scheduled to take place until 1982.

Materials used in many stateside programs for LES students are adopted on a 4-year cycle as are other curriculum materials in the school. Procedures for review are established by individual school systems or State boards of education and are employed on a periodic basis. In order to assure the appropriateness of materials for particular LES children, some schools review their materials on a weekly or monthly basis.

Selection of materials occurs at the school district, if that school district has adoption procedures, or at the State board of education, if that State has State adoption procedures. A representative committee is usually responsible for the review.

Funding.--With FY 1981 funding of about $799,000 ($760,000 for 20 teachers and $39,000 for travel, training, and other expenses), the DoDDS per pupil appropriation for LES instruction was about $100, based on the estimate of 8,000 students needing the service. By comparison, the per pupil cost for LES instruction in a school system in the Washington, D.C., area with a student population with similar ethnic characteristics was $699. No average national cost per LES student is available for comparison.

ED resources.--Substantial portions of the funds appropriated by the Congress to ED are awarded directly to local and State education agencies to encourage establishment and operation of education programs for meeting the needs of students with limited English-speaking ability. Under present legislation the overseas schools are not entitled to these resources. However, various technical assistance resouces in ED could prove helpful to the overseas schools in meeting the needs of LES students within the system.

Under the Office of Bilingual Education and Minority Languages Affairs (OBEMLA) of ED, the following programs and activities offer resources of various kinds:

- Bilingual Education Service Centers: Provides training and other services to programs of bilingual education within designated geographical areas.

- Evaluation, Dissemination, and Assessment Centers: Assists in assessing, evaluating, and disseminating bilingual education materials and tests.

- The National Clearinghouse for Bilingual Education in Rosslyn, Va.: Provides information and referral relative to materials, programs, and research in bilingual education. Funded jointly with ED's National Institute of Education (NIE).

- Research Coordinating Committee: Monitors research in three general categories: Assessment of national needs for bilingual education, improvement in the effectiveness of services to students, and improvement in title VII management and operation. The committee includes representatives of the following agencies in ED: The National Institute of Education (NIE), the National Center for Education Statistics (NCES), the Office of Planning and Budget (OPB), and the Office of Program Evaluation (OPE).

Other programs within ED that serve LES students and have the potential to serve as resources are as follows:

- Office of Special Education and Rehabilitative Services
- Administration for Children and Youth
- Basic Skills
- Office of Indian Education
- Teacher Corps

Conclusions.

- Appropriate criteria should be developed to identify, place, and assess the English-language ability of students whose families speak a language other than English. Data on school drop-out rates of all students should also be collected, because research has shown that the proportion of language minority students in the United States who drop out of school is higher than the percentage for English-background students.

- Selection of programs, staffing, and materials for the education of students with limited English-language proficiency should be consistent with the determination of the most appropriate methodologies (i.e., ESL or bilingual education), as indicated by continuing assessments of the student population. Coordinators responsible for programs for LES students should be conversant with both methodologies and be able to provide appropriate training and technical assistance.

- Funding required to fully implement the program for LES students should be made available as a line item in the budget, indicating amounts allocated for staffing inservice training, materials, travel, and other programmatic needs.

- Additional staff requested and required to fully implement the program for LES students should be hired.
- Support at all levels should be given to completion and implementation of the program guidelines presently being developed.
- A number of assessment instruments and procedures should be suggested, from which a school could select the most applicable. These instruments might include the following:
  - An oral interview to establish basic speaking/listening ability (such as the Bilingual Syntax Measure, Bilingual Inventory and Natural Language--BINL, and the ETS Test of English Speaking Ability).
  - A questionnaire to be used with parents to establish the conditions under which a child uses each language and the parents' own language (the home language as well as the range of language used in the neighborhood, at church, with peers, etc.).
  - A similar questionnaire or instrument that can be used with teachers, who often have the greatest insight into the child's linguistic abilities.
  - A short pencil and paper test of grammar and vocabulary (for older students).
  - Tests to determine proficiency in speaking languages other than English.
- A training needs assessment should be conducted for ESL teachers and coordinators of programs for LES students that would identify (1) the number of current teachers, (2) the training of current teachers, (3) the training needs/desires of current teachers, (4) the need for additional teachers and resources such as teacher aides, and (5) the skills and training needs of new teachers.
- A curriculum review should be conducted, because the materials used by classes for LES students were selected when the program began in 1976-77 and have not been reviewed since. The review should identify materials that would be adequate and appropriate for use with LES students of all ages and at all levels of proficiency. These materials should be analyzed in terms of their appropriateness for helping a child make the transition to an all-English class and should be classified according to the age and English proficiency of the student for whom they are intended.

Vocational/Career Education

As suggested earlier, the DoDDS system has a number of unique characteristics, including the geographic distribution of the schools and the unusually itinerant nature of the great majority of the students, and therefore very specific comparisons with schools in the United States can be misleading. No category of the public school system in the United States--State, large urban, suburban, rural--exactly matches the DoDDS system. Nevertheless, some general comparison of various aspects of the DoDDS vocational/career education program with vocational education in the United States may be helpful.

Program.--The range of vocational/career education programs in public schools in the United States can be wide and varied. Since 1974, there has been an increasing variety of new programs to be found in school systems in response to modern-day changes in the job market, including programs for the gifted/talented and the handicapped. Programs have traditionally included the following cluster areas: Agriculture, business and office, consumer and homemaking, distributive, trade and industrial, and diversified cooperative education. Examples of programs that have shown a significant increase in interest and demand are the following: Data processing, word processing, construction (especially heating and air conditioning), energy, horticulture, communications/media, health services, recreation, transportation, fine arts, and English-as-a-second-language.

DoDDS enrollments by comparison are heavily skewed in the direction of the pre-1974 traditional programs, and the more contemporary programs not only account for the smallest enrollments but represent only a portion of the contemporary program possibilities. The cooperative work experience program (CWE) has the best potential for expanding the range of programs responsive to the most critical demands in the job market, including more programs for the gifted/talented and the handicapped. Presently CWE is underutilized in this capacity.

Students.--Vocational education in stateside schools has grown greatly as a proportion of total programs selected by students. From 1974 to 1978, the percentage of secondary students enrolled in vocational education increased on the average from 61 to 77 percent. Since DoDDS collects data on the number of enrollments, as opposed to the number of students, in each vocational/career education course, it is impossible to determine exactly whether DoDDS has kept pace with average trends in stateside schools. It is estimated, however, that 45 percent to 60 percent of DoDDS secondary students are currently enrolled in vocational/career education courses.

Teachers.--The average pupil/teacher ratio for vocational education in public secondary schools in the United States was about 16:1 in 1980. In two Virginia school systems, Arlington County and Fairfax County, the PTR was 15:1 and 17:1, respectively, in 1980-81. The PTR in the DoDDS schools systemwide is a comparable 16:1.

Public school systems in the United States attempt to maintain a high level of quality among vocational education teachers through vigorous recruitment procedures and ongoing inservice education programs. Two major problems over the years have been the inadequate supply of qualified teachers for many programs and the lack of teaching experience among prospective teachers. In the latter case, prospective teachers are usually highly qualified through specialized training and experience in a licensed field, but have rarely received more than the basic rudiments of teacher training. Recognizing this fact, most school systems in the United States take special steps to ensure active recruitment of the best qualified vocational teachers and to provide continuous inservice education to update teaching skills.

Recruitment and inservice training present particular problems for ODS. Removed from the principal marketplace for recruiting new instructors (i.e., the United States), ODS is at a distinct disadvantage in not having ready access to the pool of best qualified people. There are ongoing needs for inservice training in all programs, and as previously stated there are particular needs for many teachers of automotive technology, cosmetology, and electricity/electronics. These and other inservice needs have been identified by the North Central Association in its accrediting visitations and by other assessment means, but clear programmatic budget policies and procedures are required to ensure that inservice monies are earmarked and subsequently expended on inservice needs.

Funding.--Program planning and implementation for most schools in the United States revolve around a systematic process of curriculum review and fiscal commitment. Communication with many school systems in the Washington, D.C., area (for example) and an examination of the annual budgets revealed that funds are earmarked as line items for vocational education, thus providing the necessary vehicle for implementing program decisions made during the planning/review cycle. Because DoDDS does not generally budget by program-based categories of expenditures and because only a portion of total expenditures for vocational education are budget-line items, it is impossible to earmark monies essential for critical maintenance, repair, and replacement of equipment.

The overseas dependents schools are not presently eligible for vocational education grants, for which only State and local educational agencies can apply. In the case of the Vocational Education Act of 1963 (P.L. 94-482), as amended, the overseas schools, as a federally operated school system, cannot share in the funding provisions of that legislation.

ED resources.--Vocational/career education programs would benefit from more direct access to the expertise, research, and specific resources available in ED, and opportunities for such direct access will be actively pursued in the coming months. Drawing upon applications of exemplary and model vocational/career programs in ED, for example, should be significantly beneficial for the overseas schools. The following are some other resources available, by ED unit:

- National Institute of Education (NIE): Educational research and development both in adult, career, and vocational education and also in educational improvement support services for the handicapped and the gifted/talented.

- National Diffusion Network (NDN): Assistance to elementary, secondary, and postsecondary institutions and others to improve their education programs through adoption of already developed and evaluated exemplary education programs.

- National Occupational Information Coordinating Committee (NOICC): Up-to-date information concerning resources for students making career decisions about occupations.

- National Institute for Handicapped Research (NIHR): Part funding for projects that deal with the development of methods, procedures, and devices to assist in providing vocational and other rehabilitation services to handicapped individuals.

- National Center for Research in Vocational Education (NCRVE): Research from selected projects (studies) dealing with problems or concerns of national significance in vocational education. Independent studies emphasize equity for the special needs population in vocational education, the design of follow-through and supportive services subsequent to job placement, and comprehensive vocational education planning for all students.

- Programs of National Significance: Results that include nationally significant applied research and development, exemplary and innovative programs, curriculum revision, development and dissemination, and demonstrations and personnel training.

- National Center for Education Statistics (NCES): Data on a wide range of programs, including vocational and technical education, that can be used in policy analysis, program planning, program management, and evaluation.

Conclusions.

- Program offerings should be expanded to be more responsive to the needs of particular age groups and exceptional students and to correspond with the most comprehensive and up-to-date employment opportunities. This would require more exploratory course offerings in the middle/junior high schools and procedures for guaranteeing opportunities for handicapped and gifted/talented students. New programs for high school students (e.g., energy training) should be added on a regular basis, as practical, to correspond with vocational education and job market opportunities in the United States.

- Participation and opportunities in the cooperative work experience program, especially for the gifted/talented, should be increased, for the purpose given in the previous recommendation.
- Systematic procedures for determining the budget, appropriating funds, and accounting for funds should be instituted for the vocational/career education program. Fiscal support essential to satisfactory delivery of programs each year (e.g., S & E requirements and inservice training) should be line-item managed, with funds specifically earmarked for these essential activities.
- Recruitment procedures should be improved and expanded so that DoDDS can compete with the best stateside schools in employing the appropriate number of trained vocational/career education teachers.
- Policies and procedures should be developed for increasing communication and coordination between vocational/career education teachers and those responsible for assisting students in career exploration (i.e., counselors, school psychologists, and others assigned to pupil personnel services in individual schools).

Programs Under Consideration

Adult Education

The Administrator of Education for Overseas Dependents appointed the Vocational/Adult Education Task Force to consider not only ways to strengthen vocational education within the DoDDS system but also the possibility of establishing an adult education program within the system. The possibility of making adult education available to the overseas community was raised in spite of certain legal constraints (discussed later) because (1) the Congress had shown concern that military dependents should receive a quality education commensurate with that offered their counterparts in the States, and (2) the armed services have strongly advocated programs to improve the general education and literacy skills of their personnel.

Adult education in public schools in the United States.--Virtually every public school system in the United States offers education programs for adults at the secondary and postsecondary levels. The target population of adult secondary school programs is usually individuals 16 years or older who are not currently required to be in school. Most of these school systems conduct the following types of programs, which have three discrete objectives, as stated:

- Adult Basic Education (ABE): To develop fundamental literacy skills in reading, language arts, and mathematics. English-as-a-second-language (ESL) for adults is part of this program.
- Adult Secondary Equivalency (ASE): To train individuals seeking an equivalency certificate for graduation from a high school.
- Skills training: To provide baseline competence in a variety of occupational areas, including vocational, business, and industrial arts fields.

The number of adults participating in adult education programs in the United States has increased more sharply in the last decade than has the number of individuals enrolled in all levels of education programs in the United States. Of the 18.3 million who participated in adult education programs in 1978, approximately 18 percent (or 3.3 million) were enrolled in adult education programs offered in public elementary and secondary schools. About 2 million adults are currently enrolled in ABE and secondary education programs, and 1 million are enrolled in ASE programs alone.

Practically every U.S. public school system offers ABE and ASE programs free to students, regardless of age and (in the case of ABE) possession of a high school diploma. Skills training and avocation courses usually involve a fee.

Armed services' position on adult education.--The armed services have been strong advocates of programs to improve the general education and literacy skills of their personnel, especially since successful programs increase work competence and reinforce positive attitudes toward military careers, the latter being the principal purpose of the Armed Services Quality of Life Program. The armed services favor extending appropriate overseas schools programs to both military and DOD dependents in the form of adult education. A recent Joint Chiefs of Staff memorandum, for example, recommended that DoDDS enter into agreements with the armed services for using the schools after hours for adult programs.[3] Furthermore, in a letter to former Secretary of Education Hufstedler, the Army recommended that after transfer of the overseas schools ED cooperate with the Army in a number of adult education initiatives, including establishment of adult education programs for overseas dependents.[4] Finally, the position of the representative of the armed services on the task force was that they strongly support an extension of the overseas dependents schools role to provide services to the adult dependent community and that military personnel should be eligible to participate in any of the overseas programs that are conducted for adult dependents.[5]

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[3] Memorandum for the Secretary of Defense [JCSM-100-80 of 16 1980] from Major General Jones E. Dalton, USAF, Vice Director Joint Chiefs of Staff, Subject: "Transfer of DOD Dependents Schools and Oversight Responsibility for Section VI Schools to the Department of Education."

One reason for the position of the armed services is that, after the All-Volunteer Force policy was adopted by the Department of Defense in 1973, the services began to attract an increasing proportion of individuals from the lower end of the ability spectrum. This trend has adversely affected the quality of performance, reenlistments, and general morale in the armed services. A March 1977 Government Accounting Office report on illiteracy in the military, for example, concluded that poor readers, when compared to normal recruit populations, (1) have higher discharge rates, (2) experience more difficulty in training, (3) perform less satisfactorily on the job, and (4) lack the potential for career advancement.[6]

The significant need in the military today for a strong continuing education component, particularly in the areas of basic skills education and equivalency education for high school certification, is supported by the following facts:

- The proportion of new enlistees with high school diplomas has dropped off steadily in the most recent 3 years in every armed service except the Marine Corps. In FY 1980, only 68 percent of new enlistees in the armed services were high school graduates.[7] In the Army, the figure was even less--54 percent.

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[4] Secretary of the Army Letter (Dec. 4, 1980) to Secretary of Education Hufstedler from General Clifford L. Alexander, Jr. U.S.A.

[5] "Position Paper on Adult Education" (Jan. 4, 1981), submitted jointly by armed services representatives on the OEOD-ED Vocational/ Adult Education Task Force.

[6] Wayne S. Sellman. "Innovations in Basic Skills Education for Military Personnel," as reported in "Proceedings of Division of Military Psychology Symposium: Innovations in Basic Skills Education for Military Personnel," Technical Memorandum 80-4, Directorate for Accession Policy, Office of the Secretary of Defense, September 1980.

[7] "Aptitude Testing, Enlisted Standards, and Recruit Quality" (draft). Office of the Assistant Secretary of Defense (Manpower, Reserve Affairs and Logistics). To be included in the FY 1982 Military Manpower Requirements Report.

- Of those entering the armed services, the proportion in the lowest mental group category has increased rather steadily in the latest 5 years.

	Percent				
Mental groups*	76	77	78	79	80
I (high aptitude)	4	4	4	2	2
II (above average aptitude)	34	26	28	25	24
III (average aptitude)	51	40	43	42	42
IV (below average aptitude)	10	30	25	30	33

*Categories are calculated on the basis of an enlistee's performance on the Armed Services Vocational Aptitude Battery (ASVAB).

The worst problem exists in the Army, where, in FY 1980, 52 percent of non-prior service accessions were in mental group IV.[8] The implication of this trend is a substantial drop in the proportion of individuals coming into the armed services with satisfactory basic literacy skills.

- Individuals with low scores on the ASVAB are significantly more inclined to do poorly on tests for advancement (e.g., the Army Standard Qualification Test) than those with higher scores.[9] The implications of this fact with respect to readiness and morale in the military are obvious.

It is apparent, therefore, that there is a critical need for a strong adult education component in today's military, and that the overseas dependents schools are a potential resource for satisfying this need.

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[8] Office of the Assistant Secretary of Defense (MRA&L). Charts dated 5 Jan. 1980 and 2 June 1980.

[9] Implications of New Armed Services Vocational Aptitude Battery and Actions to Improve the Enlist Standards Process, A Report to the House and Senate Committees on Armed Forces, Office of Assistant Secretary of Defense (Manpower, Reserve Affairs and Logistics). Dec. 31, 1980.

Previous experience in the PREP program indicates that the demand for adult education from the overseas schools would be high. A study conducted at Clark Air Force Base in the Philippines[10] states that 1,892 students enrolled in credit and non-credit courses. Of these students, 451 were dependent wives, including foreign-born wives. The increase in the need for ABE and ASE suggests that enrollments would be much higher now.

Issues involved in an overseas schools adult education program.--Initial issues to be faced in establishing an adult education program in the overseas school system include (1) legal constraints, (2) the type of courses to be offered, and (3) the source of funds to support the program.

Although the language of title XIV, which authorizes "a free public education through secondary school for dependents in overseas areas," does not necessarily preclude adult education programs, title XIV does restrict eligibility for education programs to minor (under age 21) dependents who have not completed secondary schooling, thereby excluding most adult education programs and participants. It appears, therefore, that the existing statutes limit any overseas adult education program to regular kindergarten through grade 12 (K-12) courses for minor dependents. Thus the legal constraints to offering adult education to dependents over 21 years of age and to the military would have to be determined and action initiated to obtain the authority required to extend eligibility to participate in overseas schools programs.

Programs for adults overseas should approximate those in schools stateside. They should therefore include adult basic education, adult secondary equivalency, and skills training. They might also include other courses appropriate to the overseas community, such as prenaturalization instruction, English-as-a-second-language, and avocation courses (e.g., service clubs, craft shops). The Clark Air Force Base study mentioned earlier showed that the 1974 PREP courses in highest demand were business, parent and family education, and English-as-a-second-language (including reading, writing, mathematics, and grammar).

Three types of funding for adult education programs are conceivable, depending upon the type of program and student. Most programs for adult dependents (i.e., K-12 day classes as appropriate and specially scheduled programs in ABE, English-as-a-second-language, and prenaturalization) might be funded by the overseas schools. Avocation courses for both dependents and military personnel might be offered on a fee basis to participants. Special adult programs for military personnel

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[10] Lottie J. Tryon. A Proposed Adult Education Program at Clark Air Force Base, Philippines, unpublished M.A. dissertation. College of Education, University of the Philippines, October 1974.

(e.g., ABE and ASE) might be arranged through an agreement with an armed service, with the service reimbursing the overseas schools for the programs. The overseas school system is not presently eligible for funds appropriated under the Adult Education Act (Public Law 89-750), as amended.

Resources in ED.--Extensive resources are available in ED for adult education programs that may be developed for the overseas dependents schools. These opportunities will be actively pursued if adult education programs are approved for the overseas schools. These resources include (1) the expertise of specialists in adult education, (2) available research on adult education, and (3) many successful model programs and projects. Examples of the latter group that would be relevant for armed services' personnel and dependents are as follows:

- Project CLASS (competency-based Life Ability Skills), which uses functional competency-based modules at varying reading levels to provide instruction in survival skills to adult students at elementary levels.
- Adult Learning Level Project, which is a competency-based system that deals with adult life-coping skills of consumer economics, occupational knowledge, health, community resources, and government and law.
- Adult Basic Education (ABE), which is a national system of State and local programs designed to provide educational and related services to adults who have not completed high school or who have difficulty functioning in society because of deficiencies in basic literacy skills.

Conclusions.

- An exact determination should be made of the legal constraints that stand in the way of conducting overseas education programs for adults. Once the constraints are determined, action should be initiated to obtain the necessary authority (e.g., new congressional legislation, department policy) to conduct education for adults as described in the remaining conclusions.
- All military dependents 16 years of age and older who are not otherwise enrolled in an overseas high school program should be eligible for participation. (Any existing legal constraints restricting eligibility for educational programs in the overseas schools to minor dependents would have to have been eliminated.)

- Adult education programs should be offered that approximate programs offered in most stateside schools. They should include (a) adult basic (literacy) education, English-as-a-second-language, and prenaturalization instruction; (b) a high school completion program; (c) avocation courses; and (d) other programs that can be coordinated with service voluntary education and recreation staffs at the community/installation level. Adult education programs should be planned, scheduled, and conducted as programs distinct from the other K-12 programs.

- Adult basic education, adult secondary equivalency, K-12 regular classes, English-as-a-second-language, and prenaturalization programs should be available free to dependents. Avocation courses for both dependents and military personnel should be offered on a fee basis. Any special adult programs for military members should only be arranged through formal agreements with an armed service, which would reimburse the overseas schools for the programs.

- Overseas school facilities (such as academic classrooms, shops, laboratories, and special rooms) should be opened after regular hours to community educational programs and recreational activities (such as military voluntary education programs and community functions like Boy Scout meetings). Physical plants should be viewed as community assets, freely available td adult programs and other installation-sponsored youth and adult activities on evenings, weekends, and vacation periods.

Preschool Education

The Administrator of Education for Overseas Dependents appointed an interagency preschool task force to consider establishment of a developmental preschool program in the overseas dependents school system. The task force drew extensively from the work of PSI Associates in examining current practice, in determining costs, and in developing recommendations related to preschool education in the overseas schools. PSI Associates surveyed and interviewed parents, teachers, and administrators, made classroom visits, and gathered information on community and military programs serving preschool children.

The need.--The PSI study[11] recommendation that DoDDS should implement a preschool program is appropriate for a number of reasons. These reasons, discussed as follows, draw heavily on the actual language of the PSI study in order to preserve accuracy.

1. Children below kindergarten age in overseas military families are somewhat disadvantaged compared to their counterparts in the United States, both in the small number of preschool programs available to them and in the uneven quality of those that are available. DoDDS education personnel and military parents felt this disparity strongly.

In most locations where private preschool programs do exist in the host country, there is usually only one, leaving parents no choice as to which program might best meet their child's needs or would best prepare the child for kindergarten in a U.S.-type system. Futhermore, the United States has instituted some quality control over private preschools through licensing and credentialing the staff, whereas host countries vary considerably in the amount of quality control exercised over private preschools.

2. Four-year-olds, particularly in the overseas situation, need socialization and readiness experiences, and also an alternative to kindergarten for those who, though chronologically eligible, are not developmentally ready for kindergarten. DoDDS kindergarten teachers interviewed by PSI pointed out the need for preschools to provide such experiences, and an ED educational services review conducted in December 1980 and January 1981 confirmed that ongoing teacher concern.

Preschool-age children living overseas have unique opportunities to learn another culture, but sometimes limited opportunities to learn their own. They do not always have American television and radio programs for children, or neighborhood parks and extended families to provide the common daily social experiences children are expected to bring to kindergarten. Preschool programs are not available in sufficient number to compensate for the limited opportunities for both socialization and language development. Moreover, as 5-year-olds are increasingly expected to bring more information with them to kindergarten, those children without earlier broad exposure and social experiences need preschool to help put them on a par with their classmates.

In addition, English-as-a-second-language (ESL) was identified by both parents and DoDDS teachers in the study as a special concern. Especially where English is not spoken in the home at all, many children lack sufficient opportunity to develop basic fluency in the language before kindergarten. English-language fluency will probably remain an important issue in the overseas dependents schools as the proportion of minority members of the armed services continues to grow.

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[11] Preschool Education Feasibility Study of Program Options for the Department of Defense Dependent Schools. PSI Associates, Inc. Washington, D.C., Oct. 19, 1980.

3. The benefits of early intervention in education outweigh the costs. For example, a recent study[12] provided evidence of the long-term benefits of a preschool program for students. The researchers were able to demonstrate increased student achievement in reading, language, and mathematics; reduced need for special education classes; greater commitment to school and to education; and reductions in later years in antisocial and delinquent behavior. This has been the rationale for financing Head Start and similar early intervention programs. While the socioeconomic status of DoDDS parents is significantly higher than that of Head Start parents, a number of DoDDS teachers and principals felt that early intervention can nonetheless be beneficial.

4. Articulation is limited between DoDDS and existing host nation preschool programs. While informal meetings are sometimes held to discuss the two programs, there is no coordination of goals, curriculum, or teaching strategies. According to DoDDS teachers, for example, some existing preschools include a kindergarten curriculum in their programs before children are ready for formal learning. Regional offices cited consistency with kindergarten and coordination of goals as an advantage of a DoDDS preschool program.

5. Half-day preschool programs provide a viable child care alternative to military families needing all-day services when they are used in conjunction with other child care arrangements. The military services generally support the concept of a DoDDS-funded and -administered prekindergarten program.

Costs.--Although preschool programs ofttimes have classes for both 3- and 4-year-olds, the costs projected by PSI for both groups, as well as for 4-year olds only, suggest that serious consideration should be given at the moment to instituting the preschool program for only the older group of children. Furthermore, because of the need for and high cost of facilities and construction, the program should be planned during the first year and then phased in as facilities become available, with full implementation no later than school year 1985-86. And finally, it was thought that an administrative structure similar to that of other DoDDS programs would be necessary; namely, one full-time coordinator in each region plus one coordinator in the DoDDS headquarters. Even with this simplification of the problem, a determination of costs to implement a developmental preschool program depends upon several factors--the number of schools identified for the phased-in start-up, the time that each would begin its program, the type of program offered, and the nature and extent of cooperative arrangements made with the military services.

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[12] Schweinhart, Lawrence J. and David P. Weikart. *Young Children Grow Up: The Effects of the Perry Preschool Program on Youths Through Age Fifteen.* High/Scope Educational Research Foundation. Upsilanti, Mich.: 1980.

It is projected that, with a pupil/teacher ratio of 20:1 (the ratio recommended by the regions), annual operational costs for a traditional 2-1/2-hour session would be $2,000 per pupil. Thus the projected annual cost for providing such a program for an estimated 14,407 children 4 years of age would be $30 million. Additional start-up and capital costs as well as operational costs for the program for both 1-year and 2-year programs are given in some detail in the PSI study. Costs for the administrative structure to coordinate the program would total about $1,040,000 annually.

Conclusions.

- The Congress should amend Public Law 95-561 to mandate that a 1-year developmental preschool education program for 4-year-olds be phased in to the overseas dependents schools and fully implemented by school year 1985-86. School year 1981-82 should be used for planning and the next 3 years for phased-in implementation and facilities renovation/construction, where needed.
- The Congress should appropriate funds for program planning and implementation. The amount could be determined with the aid of the PSI study of costs for starting up the program.
- Planners should consider the following: Various ways to deliver the program in order to utilize and coordinate with community resources such as the military child care programs; knowledge, materials, training packages, and alternative approaches developed by other Federal- and State-funded preschool programs, such as Head Start and Home Start; recent research and experiences in preschool education, such as parental involvement; and the possibility of organizing and delivering the program in different ways in different parts of the world, to reflect local needs and resources.

RECOMMENDATIONS

The conclusions in the subsections of the analysis section are in themselves recommendations of a kind that refer to specific programs and services. This section, however, attempts to develop a number of key recommendations from those common threads identified in the various sets of separate conclusions in the previous section. These recommendations, for the most part, concentrate on critical functions for effectively operating and administering instructional programs in a school system with the educational programs, large and mobile population, and geographic dispersion of DoDDS.

1. Data should be routinely collected and utilized on teachers (e.g., certification levels, university degrees, experience, and training needs), students (e.g., demographic profile, aptitudes, and testing results), characteristics of schools, and other important factors. Presently, DoDDS does not systematically perform this function. In addition, a computer-based system to store, process, and retrieve these data should be established.

   This is important to the systematic formulation of realistic plans and policies in any large school district, but it is essential in the overseas schools, where rapid turnover in the student population generally and in teacher populations in many locations can affect education programs and services. The proper identification, assessment, and placement of students, as well as the availability of current information on teacher skills and other instructional resources, are necessary prerequisites for effectively designing and delivering most education programs and services, and in particular such title XIV programs as education for the handicapped, education for the gifted/talented, compensatory education, and education for limited English-speaking students. The use of standard definitions (e.g., for handicapped children, limited English-speaking children) in collecting data is of course vital if the system is to be an effective tool in shaping plans and policies for the overseas schools.

2. Policies that require specific local school participation in the curriculum review steps of the Five-Year Curriculum Development Plan should be formulated and implemented. Necessary procedures and funding, as well as any organizational realignments and definitions of authority and responsibility associated with organizational roles should also be provided to ensure greater participation by local schools than presently occurs in systemwide curriculum review and policymaking and greater coordination among the various organizational levels in administering education programs.

This recommendation would not only be consistent with the congressional purpose of increasing the participation of parents, teachers, students, school administrators, and members of the armed services in the administration and operation of the schools, but it would also give a greater voice in determining the full range of instruction desired to those who are actually receiving and providing education programs and services in the schools themselves. The establishment of the local school advisory committees should provide opportunities for even greater participation by school community members in the operation of the schools.

3. A system for setting priorities for education programs should be developed, and the goals of the various education programs should be examined for areas of similarity in order to organize human and dollar resources more efficiently around shared program goals.

   A basic flaw in the 5-year curriculum review concept is the assumption that resources and political realities will allow for equal treatment of all education programs through the 5-year cycle.

4. The planning and review process should feed directly into the budgetary process.

   The budget should contain specific dollar line items for staffing and other resources necessary to implement decisions made as a result of 5-year curriculum review activities, and accounting procedures should be adopted that track how monies budgeted are actually spent. Because such systematic budgeting and accounting procedures presently do not exist in DoDDS, it is impossible to administer instructional programs with any assurances that funds will be budgeted and expended in support of curriculum planning and review decisions. Such assurance is necessary if instructional programs are to be operated and administered effectively.

5. Program-based budget practices should be adopted similar to those of most stateside public schools, in which funds for each education program are individually budgeted, expended, and tracked.

6. A comprehensive inservice education program, with supporting policies, procedures, and funds, should be adopted. Such a program will entail changes in current policies and practices that contain restrictions seriously affecting travel, education services,

contracts, and timely delivery of education resources. It will also entail committing appropriate funds to inservice education priorities, with assurance that such funds will not be expended in other areas.

Adequate inservice education is important to any school system, but for the overseas dependents schools--schools geographically removed from stateside-professional activities that deal with the most up-to-date theories and practices in education--it is absolutely essential. A comprehensive inservice education program should include selection of the most appropriate modes (e.g., teacher centers and workshops) for delivering inservice programs, development of logistical mechanisms (contracting policies and supply procedures) for delivering inservice programs when they are needed, and procedures for selecting only the most skilled inservice educators and relevant programs.

7. Mechanisms should be developed that provide opportunities for sharing educational ideas, resources, and approaches among schools and regions of the overseas school system itself and among the overseas schools and organizations with a direct interest in and commitment to improving educational research and practice.

   A practical policy must be adopted that will permit the overseas schools and individual educators to continuously interact with groups involved in designing and distributing educational materials (e.g., regional R & D laboratories and various educational organizations), and to participate in professional meetings, conferences, and workshops in the United States and around the globe.

8. Since it is impossible to operate and administer instructional programs without adequate requisition and maintenance practices, logistical mechanisms should be adopted that provide realistic support to education programs and services.

   Delivery of educational materials in the overseas schools is often extremely late (2 years or more in some cases), and proper servicing of instructional equipment is often lacking. In most stateside schools, educational materials usually arrive on time and provision is made for regular maintenance, repair, and replacement of instructional equipment.

9. A comprehensive program of evaluation should be funded and conducted to determine, on a continuing basis, the effectiveness of individual education programs and services and of the overall instructional program.

Areas needing improvement should be specifically identified for special consideration in planning future inservice education and research activities. The evaluation program findings should be fed, regularly and systematically, into the planning cycle for education programs and services.

10. A standard report form should be developed that will reduce problems of articulation between education programs as students rotate between stateside and overseas public schools. The report form should list the knowledge and skill levels achieved by a student along a continuum of knowledge and skill components by subject areas from preschool through grade 12. The report form should also contain other appropriate information about student needs and progress.

    Having a detailed profile of a student's knowledge/skill level, the receiving school would be better able to prescribe instruction geared to a student's exact achievement and provide continuity in the overall education program. Many stateside school systems employ this practice as part of competency-based record systems, and ED developed a Migrant Student Record Tracking System to deal with the record transfer problem associated with migratory workers' dependents, who move continuously between school systems.

11. The Congress should amend Public Law 95-561 to mandate a 1-year developmental preschool education program for 4-year olds as specified under "Programs Under Consideration" in the analysis section. The Congress should also provide any necessary amendment of Public Law 95-561 to permit programs for adults (K-12) as described under "Programs Under Consideration" in the analysis section.

12. The Congress should fund a single appropriation each year to cover all education programs and services for overseas dependents and remove the overseas school system from those eligible for appropriations authorized presently under title IV and title IX of Public Law 95-561.

    The Education Amendments of 1978 (Public Law 95-561) contains provisions for limited funding for which some overseas schools education programs are eligible. These provisions are contained in title IV, section 403(c) (for which such programs as the education media and compensatory education programs are eligible) and title IX, section 906(c) (for which the gifted/talented program is eligible). This recommendation would simplify the operation and administration of education programs and avoid problems associated with having the overseas school system eligible for a share of funds that otherwise could be distributed in total among locally supported school districts in the United States.

TRANSFER ARRANGEMENTS

It is proposed that a formal written agreement be negotiated between ED and the military departments providing related services to handicapped students in the overseas schools. The Office of Special Education and Rehabilitative Services (OSERS) will report to the Secretary of Education on the status of compliance by the overseas schools with any applicable provisions relating to the education of the handicapped and will provide technical assistance as appropriate to ensure that the requirements of these provisions are being implemented effectively.

It is also proposed that assurances be solicited from the military services that facilities, equipment, personnel, and military instructional assistance heretofore used by the overseas dependents schools as part of the cooperative work experience program will continue to be available for vocational training. This assistance includes permission to use facilities such as the motor pool, machine and metal shop, jet engine shop, and the like, as well as related mechanical, electrical, electronic, and other equipment.

CHAPTER III

PERSONNEL MANAGEMENT

DESCRIPTION

STAFFING

Since the early 1970's, school enrollment and staffing have steadily declined. From 1973 to 1979, school enrollment dropped from about 156,000 to 131,000, and staffing decreased from 10,260 to 9,340. However, the transfer of the former Panama Canal Company schools to DoDDS in 1979 resulted in an addition of 9,400 students and 950 employees. This action and other staffing increases raised the FY 1980 total staffing level to 10,904.

Authorized positions can be broken down into four major categories. The number of staff in each was as follows:

General Schedule Employees Full-time school, regional, and headquarters administrative and education specialist staff, and paraprofessionals employed under competitive and excepted service appointment authority	1,759
Public Law 86-91 Employees Professional teaching and specialists positions, including substitute teachers, employed under the authority of Public Law 86-91 (the Defense Department Overseas Teachers Pay and Personnel Practices Act)	7,899
Junior ROTC Instructors Military science instructors employed under the authority of Title 10, U.S.C.2031(d)	30
Foreign Nationals Foreign national clerical and administrative support personnel and teachers in the host nation program employed under special arrangements with the host government	1,216
Total	10,904

PERSONNEL OPERATIONS

Personnel management in the overseas dependents schools is highly decentralized and relies on military civilian personnel offices in the United States and overseas for support.

Work Force Planning

Each year during the budget formulation process, school principals submit estimates of staffing requirements based on projected enrollment and pupil-teacher ratio standards recommended by U.S. school accrediting associations. These estimates are forwarded to the regional office and consolidated in each region's budget request. Upon approval of the regional operating budget plan by ODS, regional directors allocate authorized positions among schools in accordance with current needs and overall ceiling limitations. This process is based on 1-year planning.

No comprehensive system now exists in DoDDS to collect accurate and comprehensive data on students or personnel at regular intervals.

Recruitment and Selection

Recruitment of staff to fill projected vacancies of school personnel is based on three sequential processes: An annual transfer program that allows on-board personnel to request reassignments to positions within and among the six regions, hiring of qualified personnel available locally, and recruitment of new hires in the United States for remaining vacancies. (DOD policy requires that priority consideration for teaching positions filled locally be given to dependent spouses of military or civilian personnel employed by a DOD agency.) Over the past 5 years, an average of about 1,200 vacancies were filled annually for teaching and support positions. Between 600 and 800 vacancies were filled through voluntary transfers, reassignment of personnel from schools with reduced enrollments, and local hires. Recruitment of teachers in the United States has slowed somewhat in recent years and currently averages between 400 and 600 employees each year.

The locus of authority to select school personnel varies, depending upon whether the personnel are being transferred, hired locally, or recruited from the United States. Transfers of on-board personnel are usually approved by the regional directors in consultation with the school principal. New personnel hired locally are selected by school principals from lists of eligible candidates presented to them by the civilian personnel office of the military department servicing components that provide basic support services to the schools. New personnel recruited from the United States are selected by the ODS Personnel Division.

Personnel at the regional level and individual school principals are selected by the regional director, unless their grade is at the GS-14 level or above, in which case ODS approval is required.

Performance Evaluation

All school personnel are evaluated annually. School-level teaching and support personnel are evaluated by the school principal based on periodic observation of their performance of teaching and administrative duties. Most professional teaching and support positions are excepted (non-competitive) appointments under the authority of Public Law 86-91, and unsatisfactory performance is sufficient grounds for termination of appointment. Full-time regional office staff and headquarters staff are competitive civil service appointments and subject to an annual performance appraisal. Positions classified at the GS-13 through

GS-15 level with supervisory or management responsibilities are now covered under merit pay plans effective October 1, 1980. These plans are compatible with those in use by the Department of Education.

Personnel Support Services

DoDDS has a headquarters division and regional office personnel divisions responsible for managing the overall personnel program for the overseas school system, including Public Law 86-91 recruitment, staff planning, and advising of regional and school administrators on personnel matters. They are also responsible for the labor-management relations program and employee relations issues and grievances. The headquarters Personnel Division has approximately 20 employees and each regional office has 5 or 6 employees (with the Panama office having 3 employees).

However, the largest operating element of the DoDDS personnel system is carried out by the military department civilian personnel offices under interservice support agreements between DoDDS and the dominant servicing components. The support agreements (of which personnel operations are only one part) are negotiated annually between the DoDDS school principal or educational program administrator and the local military command.

The personnel services provided to DoDDS include employment processing, personnel placement, classification of positions, labor-management relations, personnel records maintenance, equal employment opportunity, grievances and appeals processing, employee development and training programs, and hiring of local national employees. DoDDS currently receives personnel support from 53 civilian personnel offices worldwide. For FY 1980 DoDDS reimbursed the military departments $2.9 million for these personnel services. This provided an estimated 131 person-years of personnel support. For FY 1981 the estimated cost is $3.2 million for 131 person-years of support.

Some of the civilian personnel offices are organized so that one unit is totally responsible for DoDDS personnel services. In others, DoDDS support is combined with the personnel work of the other DOD activities being served.

Career Development

In DoDDS, career development focuses primarily on principals, teachers, and education program specialists. It consists of a certification/recertification requirements program and a career educators development program. All positions involving professional educators require certification upon employment with DoDDS and continued work to obtain a minimum of 120 recertification units within subsequent 6-year periods of employment. These requirements became effective on April 1, 1980.

The career educators development program is aimed at providing career development opportunities and related training and work experience for school-level administrative positions and above school-level education specialist positions at the GS-12 through GS-15 level. Most such positions are filled internally by current DoDDS employees rather than through recruitment from U.S. schools.

Equal Employment Opportunity

In accordance with DOD-wide policy guidance, DoDDS has an equal employment opportunity (EEO) program at the headquarters level and in each region. Overall responsibility is vested in the Director of DoDDS and delegated, in turn, to regional directors and school principals for their respective geographic areas of responsibility. In addition to designated EEO officers in headquarters and each region, personnel have also been designated as coordinators for women's programs and Hispanic employment.

Women constitute about two-thirds of the U.S. nationals employed by DoDDS. The majority of professional educators are women, as is true in most U.S. school systems. Employees of racial/ethnic minority backgrounds accounted for about 8 percent of the U.S. employees in 1980. During the past several years, more emphasis has been placed on recruiting minorities as well as increasing opportunities for women in supervisory and management positions. Approximately 11 percent of the supervisory/management positions in DoDDS are now filled with women and/or minorities.

Labor-Management Relations

About 68 percent of the professional educators in the overseas dependents schools are active members of professional employee organizations. They are represented by three organizations: The Overseas Education Association, the Overseas Federation of Teachers, and the American Federation of Teachers (Panama). As the largest employee organization, representing teachers in over 80 percent of the schools, the Overseas Education Association was accorded exclusive national recognition in 1976 for representing all teachers not covered by other agreements, and a 3-year collective bargaining agreement was signed by DOD in March 1977. This agreement expired in March 1980 but remains in effect pending a decision by the Federal Labor Relations Authority on whether a single worldwide bargaining unit should be maintained or separate regional bargaining units established. Regional agreements are in effect in some regions with other associations, such as the Overseas Federation of Teachers, which represent substantial numbers of employees.

In contrast to many U.S. public school systems that have collective bargaining agreements, salary scales are not subject to negotiation. Conditions of employment are covered, however, and represent a very broad range of concerns because housing allowances, overseas travel, and access to military facilities are important benefits of overseas employment. As a consequence, unfair labor practices and grievances involve more extensive and complex issues than would be typical in other U.S. school systems.

DoDDS headquarters has a management-employee relations branch within the Personnel Division, and each regional office is staffed with labor relations specialists. Responsibility for carrying out labor-management relations including compliance with provisions of collective bargaining agreements rests primarily with the principal of each school. Regional directors are responsible for periodic consultations with employee associations and resolution of grievances and unfair labor practice complaints that cannot be resolved at the school level. Final authority for labor-management relations, including negotiation of the national collective bargaining agreement and final resolution of grievances and unfair labor practice complaints (when necessary), rests with the Director of DoDDS.

The professional employee associations represent members at the school, regional, and national levels through elected officials and a professional staff employed by the associations. Individual school faculty representatives, country and regional elected officials, and national association officers are well organized and meet regularly to discuss member concerns. In addition, they receive association-sponsored training on labor-management relations and publish newsletters at all levels to keep members informed.

RETENTION OF PERSONNEL BENEFITS FOLLOWING TRANSFER TO ED

The relationship of overseas employees of DOD (both military and civilian) to laws of the host country is controlled by status of forces agreements (SOFA's). Specific provisions within these agreements directly affect overseas dependents school personnel.

Benefits, services, and facilities accorded to U.S. civilian personnel under these agreements include (but are not necessarily limited to) the following:

- o Access to commissary and post exchange privileges.
- o Exemption from certain host country customs or duties.
- o Exemption from certain host country taxes.
- o Automobile licensing privileges.

U.S. military commanders have responsibility and commensurate authority for ensuring that the U.S. Government can meet its reciprocal obligations under these intergovernmental agreements, both for the military and civilian components covered by the SOFA's.

Section 419(a) of Public Law 96-88 provides for preserving these benefits after the overseas schools are transferred from DOD to ED:

> "Notwithstanding the transfer of functions from the Secretary of Defense to the Secretary of Education under section 302 (and the consequent transfer of personnel), all personnel performing such functions shall be treated, for the purpose of access to services and facilities provided by the Department of Defense, as employees of the Department of Defense."

Public Law 96-88 further enforces this protection in section 401(f):

> "For purposes of any status of forces agreement between the United States and any other country or any international organization, any reference to 'civilian component' shall be deemed to include a reference to overseas personnel of the overseas dependents' education system."

The following passage from Senate Report No. 96-49 (1st Session, p.48 of Public Law 96-88) reflects congressional intent on the subject of retention of benefits under SOFAs:

> "The Committee intends that all benefits presently enjoyed by personnel of the overseas schools be unaffected and retained through the transfer of the schools to the Department of Education. Section 401(g) of the legislation specifically provides that the U.S. government shall continue to classify overseas personnel as the civilian component of any status of forces agreements between the U.S. and a foreign country or international organization. The Committee intends that this apply to all agreements giving special treatment or status to personnel of the overseas schools, whether they are defined specifically as the 'civilian component' in that agreement or in a similar manner. Further, section 421(a)(2) provides that the overseas personnel shall continue to be treated by the Defense Department as their employees so that they may continue to receive any and all benefits available to them at the present time. The Committee believes these important benefits, such as access to commissaries, exchanges and other military related facilities, can be continued with no disruption or inconvenience to either the overseas personnel or the Department of Defense."

A number of these benefits flow from the status of forces agreements between the United States and the host countries. Further actions taken to ensure that these benefits and privileges will continue after transfer are discussed in the section on Transfer Arrangements at the end of this chapter, and an interdepartmental agreement covering the status of overseas personnel is included as appendix H.

ANALYSIS

During the review of personnel requirements and support arrangements, several problem areas were noted in work force planning, personnel support service, and teacher recuitment, placement, and transfer.

WORK FORCE PLANNING

The most critical factors in work force planning are (1) accurate projections of student enrollment and special needs, (2) current information on the status, qualifications, and assignment preferences of current employees, and (3) anticipated staff turnover projections. On a systemwide basis, annual enrollment projections have been fairly accurate, but the accuracy of regional and school-level enrollment projections varies more widely, thus contributing to inadequate work force planning. Data on student characteristics and special needs are lacking. Many stateside schools face similar problems, but the geographical dispersion of the overseas schools, the lead time required for recruitment in the United States, and the lack of locally qualified candidates in many overseas locations make it far more difficult for DoDDS to recover from inadequate planning and inaccurate projections. These inaccurate projections occur because of the lack of a comprehensive personnel data system in DoDDS.

This same lack of a comprehensive data system has limited the effectiveness of DoDDS collection of data on teacher qualifications, tenure with DoDDS, retirement eligibility dates, salary rates, reaccreditation work completed, enrollment in advance degree programs, reassignment preferences, and other factors. Such data are available but not utilized on a systemwide basis for work force planning and analysis purposes at the national and regional level.

Finally, more timely data on anticipated teacher turnover are needed. It is important to have these data early so that the number of new teachers required will be known and recruitment can begin as early as possible. Most U.S. school districts use teacher contracts that must be signed by a fixed date prior to the close of the school year. In this way the school district knows the rate of return of current teachers and which specific vacancies must be filled. DoDDS does not use a formal individual contract with each teacher but bases its projections simply on individual statements of intent, and therefore is less certain about anticipated teacher turnover.

The work force planning process could be improved in the following ways:

- o The importance of accurate and more comprehensive enrollment projections at the school level should be more strongly emphasized. In addition, to comply with the mandated programs of Public Law 95-561, title XIV, it is important that enrollment projection data include specific student needs and characteristics data. The projected needs and staffing requirements for programs for the handicapped, the gifted/talented, and individuals with limited English-language proficiency, for example, are now important ingredients for the work force planning for DoDDS. This is especially critical for recruitment planning because some if not all of these teaching areas are "shortage" categories, and more intensive recruitment efforts may thus be needed to produce an adequate supply of qualified and available teachers.

- The principal objective of the teacher transfer program should be revised to focus on systematically matching staff resources with projected needs. It should include a 5-year limit on assignments to a single overseas school complex in order to promote career development and assure greater equity in meeting teacher assignment preferences.
- A personnel data system should be implemented or designed to more systematically assess and better utilize the current work force. As previously stated, staffing should begin with the proper placement and most effective utilization of current employees. Data on employee qualifications, training, performance, certification status, and job experience should be maintained and used for reassignments to fill anticipated vacancies with qualified on-board employees and to respond to employee-initiated reassignment requests.
- The annual work force planning process should emphasize an integrated multi-year approach. The existing processes stress 1-year planning. A system as large and as complex as DoDDS should have a multi-year approach to work force analysis and planning. As such, the DoDDS work force planning system should also be integrated into the total management process where it would link with budget, personnel, and school operations.

PERSONNEL SUPPORT SERVICES

Military department finance offices provide payroll support services, and civilian personnel offices provide other personnel services for the overseas school staff. The quality of the service now being received has to be judged as uneven. The most common complaints involve long delays in resolving payroll payment errors, lack of accurate information on personnel policies, and inconsistencies among Army, Navy, and Air Force civilian personnel offices in implementing policies. The personnel problems of the overseas schools are unique:

- Teachers are employed under a separate personnel authority, Public Law 86-91 (Defense Department Overseas Teachers'

Pay & Personnel Practices Act), which governs the salaries and personnel practices applicable to overseas teachers. This law applies only to DoDDS employees, and therefore the civilian personnel offices are not accustomed to dealing with it except for DoDDS personnel.

- The teacher pay schedule is separate from other DOD civilian pay schedules and is more complicated. Teacher pay is governed by Public Law 96-81 and therefore is unique to DoDDS. The DOD Wage Fixing Authority determines annual adjustments to teacher salaries based on a comparative survey with approximately 200 U.S. school districts. Pay adjustments are made in April, creating retroactive benefits involving two fiscal year appropriations. This situation causes administrative problems because all retroactive salary adjustments are computed manually.
- Teachers and other educators are appointed under "excepted" (non-competitive) personnel authority and are therefore different from regular career civil service appointments. This causes more paperwork and produces a higher rate of administrative error.
- Teachers are seasonal employees in that they are hired and processed in summer and fall and have to be terminated in the spring at the close of the school year. Especially in the late summer period, there is a larger than normal workload in the civilian personnel offices.
- The interface between the personnel operation and the payroll system is not always smooth because of the differences in administrative systems.
- Some civilian personnel offices experience frequent turnover in personnel.

Despite the problems that have been described, the geographical dispersion of the overseas school system and the decentralized nature of the personnel service operation make it logical to continue the current personnel servicing arrangements after the transfer from the Department of Defense to the Department of Education. The only alternative would be to establish a totally independent personnel operation within the overseas school system. This idea has been discussed extensively. However, a continuation of the present arrangements was judged to be most cost effective, least disruptive for the system, and most consistent with the statutory requirement that overseas personnel continue to be treated as members of the "civilian component" of the armed services following transfer to ED.

TEACHER RECRUITMENT, PLACEMENT, AND TRANSFER

Recruitment

The Personnel Division in DoDDS headquarters has complete responsibility for coordinating the recruitment of teachers in the United States to fill vacant positions in the overseas dependents school system. As described earlier, this is a lengthy and complex process. It is lengthy because of the decentralized nature of the planning requirements and the interaction with the transfer programs. It is complex because of the geographic separation between the supply of new teachers (mainly from the United States) and the location of employment in foreign countries. The process for evaluating credentials and interviewing candidates requires extensive paperwork and complex scheduling. Finally, expert judgment and coordination are required to make firm commitments for employment. The major problems that have been manifested are late arrivals of teachers, last-minute changes in teacher assignments, and shortages of teachers for some subject areas.

To improve the teacher recruitment program, it is recommended that the procedures be modified to provide for earlier starting dates or that a continuous recruitment effort be considered. A second major change that may be required is a more selective and better focused recruitment effort. This is especially true for hard-to-fill positions such as those for special education personnel and minority candidates to meet the affirmative action goals of DoDDS. Finally, greater reliance on recruiters assigned from each region with authority to make on-the-spot job offers to qualified candidates for vacancies in their schools would facilitate the recruitment process.

Placement and Transfer

Reassignment of the DoDDS teaching staff among schools is based largely on the teacher transfer program. The process is designed primarily to facilitate movement of personnel in and out of less desirable locations and to respond to personal preferences for reassignment rather than to systematically match personnel resources with overall staffing needs in an established process. Although mandatory reassignment of individuals is permitted, it is used infrequently. DoDDS is also the only major Government agency with a large overseas work force that does not require periodic rotation of its personnel as standard policy, in part because of the lack of U.S.-based teaching positions in DOD. General Schedule competitive employees of DoDDS are the only group limited to a 5-year overseas tour in accordance with DOD-wide policy. The limitation on opportunities for rotating teachers within DoDDS and between DoDDS and U.S. public school districts has encouraged the tendency for many teachers to remain in the same locations, particularly in the more desirable countries, on a semi-permanent basis.

At the present time, the intra-regional and inter-regional transfer programs work on a sequential basis. The procedures for administering the intra-regional program have been left to the discretion of each regional director. The purpose of the inter-regional transfer program is stated as the "placement into and out of hardship areas." It is basically a request-based system for transfer into or out of 1-year hardship tour areas. Placement is based on the number of open positions in the transfer program and a point-ranking system in turn based on current location of the teachers and their tenure in the DoDDS system.

The general perception of many people in the DoDDS system is that the opportunities for advancement and transfer are less than they were previously. Also, many teachers are dissatisfied with the teacher transfer program. They complain that there are not enough opportunities for transfer and that they become locked into one location. Administrators complain that the transfer program is too cumbersome and time-consuming and interferes with the recruitment process.

These problems are partly the result of operating the teacher transfer program on a worldwide basis. The complexity of this operation should not be minimized. Most organizations that have employee transfer programs do not have to cope with the decentralized nature of the requirements planning and most do not have as wide a range of jobs to fill as has DoDDS.

The transfer program is also costly. DoDDS estimates that it costs an average of $5,000 to move a teacher from one duty station to another, and thus local hires already in the area are desirable from a cost standpoint. Furthermore, DOD policy encourages expanding employment opportunities for dependents stationed overseas.

Finally, the lack of mobility may be due to the maturing nature of the DoDDS system. As school enrollment continues to decline, the work force is no longer expanding and there are fewer job opportunities open to enable people to move within the system. This is certainly a situation that school districts in the United States have experienced.

Several basic changes should be considered to address the problems enumerated:

- Integrating the transfer process into a total work force planning system.
- Establishing a working group to implement a revised teacher transfer program. This group should be made up of personnel specialists, school-level administrators, and teachers and should develop an implementation plan and approach that would be sensitive to both the management and employee implications of the transfer program.
- Combining the intra- and inter-regional plans into one process to save time.

- Establishing periodic rotation of personnel among schools and regions as a firm policy for all employees after a fixed time period.
- Instituting a general requirement that U.S. personnel overseas rotate to positions within the Department in the United States.
- Exploring arrangements with school systems in the continental United States to provide for interchange of personnel. This was done on a limited basis with the District of Columbia public schools at one time, but it was judged to be ineffective. However, it is now more important to find ways to lessen the impact of isolation of employees in the system and to aid in mobility and career development.
- Rather than developing a relationship with one U.S. school district, undertaking a broad-based effort to enter into agreements with a consortium of school districts to provide for interchange of staff on a regular basis. This arrangement would be based on designation of a set number of overseas jobs to be filled by personnel who would remain employees of the U.S. school districts and would thus be similar to arrangements for Canadian teachers serving overseas with their Armed Forces. Such an arrangement should provide for a careful screening and selection and a thorough performance evaluation procedure.

A regular exchange of personnel would provide an opportunity for mobility of employees back to the United States that does not now exist. It would reduce the isolation that teachers now perceive, minimize the stagnation that comes from a closed personnel system, and provide for increased continuing education opportunities for overseas school personnel.

RECOMMENDATIONS

1. A comprehensive work force planning system should be developed for implementation during the 1982-83 school year.

   The system should be supported by a current inventory of staff qualifications, experience, and other essential data, and include subsystems for career devvelopment and training, personnel transfer plans, recruiting projections, and other components of an effective work force planning system.

2. A mandatory rotation policy should be established for U.S. professional personnel based on a maximum tour of 5 years in the same school complex/installation.

   This policy will require a gradual phase-in over several years and should begin in the 1983-84 school year. A mandatory rotation policy is consistent with practices of other U.S. Government agencies with overseas personnel and would serve as an important incentive for career development retention and renewal of the overseas schools staff.

3. Additional opportunities should be created for exchange teaching and administrative staff between the overseas dependents schools and U.S. school districts.

   ED will explore arrangements with school systems in the United States to provide for interchange of personnel. This would lessen the impact of isolation felt by employees in the DoDDS system. It would also enhance career development and increase the overall mobility of employees. This effort might involve agreements with consortia of school districts to provide for interchange of staff on a preplanned basis. Opportunities for rotation of personnel to positions in the Department of Education will also be explored.

4. The teacher recruitment program should be improved by placing more emphasis on accurate recruitment projections, timeliness of hiring commitments, and better targeted recruitment efforts in the United States.

   The recruitment procedures should be modified to provide for continuous and better U.S. recruiting. A more selective recruitment effort should be planned, both to find personnel for hard-to-fill positions such as those for special education teachers and also to increase minority hiring.

TRANSFER ARRANGEMENTS

An interdepartmental servicing agreement has been prepared to ensure continued reliance on the civilian personnel offices of the Army, Navy, and Air Force to support overseas school employees following transfer. A copy of the proposed agreement, included as appendix I, describes the respective responsibilities of each of the military departments and ED arrangements for reimbursement for services provided.

An interdepartmental agreement concerning the status of overseas schools personnel in the host country has been prepared in consultation with the Department of Defense and the Department of State. This approach was recommended by the legal counsel of all three departments as the most appropriate vehicle for carrying out the intent of the Congress that all benefits remain intact after the transfer. The proposed agreement is premised on the single point that all benefits and responsibilities remain the same after the transfer. Major points in this agreement, included here as appendix H, state that DOD shall do the following:

- Continue to provide personnel services to the overseas employees of the dependents education system.
- Treat all overseas school system personnel, for the purposes of access to services and facilities, as employees of DOD.
- Treat overseas school system personnel as members of the "civilian component" of the armed services.
- Accord to overseas school system personnel benefits, services, and facilities that shall include, but not be limited to, the following:
    - Access to commissary and post exchange privileges.
    - Assistance in maintaining benefits with respect to tax exemptions, customs and duty exemptions, automobile licensing privileges, exemptions from local registration requirements, and other benefits and services provided under status of forces agreements.
    - Availability of medical services to overseas school system personnel on the same basis as to other members of DOD's civilian component.
- Provide administrative control over overseas school system personnel.
- Issue travel orders, identification cards, and other necessary documentation for overseas school system personnel.

Plans have been made to prepare a complete listing of all personnel employed by DoDDS for purposes of transferring personnel to ED through a determination order by the Director of the Office of Management and Budget. As a general policy, DOD components that provide personnel whose duties involve substantial direct support for the overseas dependents schools but who are not employed by DoDDS will be reimbursed for such services under interdepartmental servicing agreements. These employees would not be transferred to ED.

Personnel management functions pertaining to the overseas dependents schools will be assigned to the Office of Education for Overseas Dependents upon transfer in recognition of the unique requirements for operating the overseas school system.

CHAPTER IV

FINANCIAL MANAGEMENT

DESCRIPTION

INTERNAL FISCAL FUNCTIONS

Overall responsibility for the budget and financial management of the Department of Defense Dependents Schools (DoDDS) rests with the Fiscal Division of the school system's central office, the Office of Dependents Schools (ODS) in Alexandria, Va. The management of funds, property, and other assets by the ODS Fiscal Division is supported by counterpart fiscal divisions located in each of six overseas regional offices.

The ODS Fiscal Division has three branches (budget, accounting, and management) and an authorized staff of 13 employees. There are an additional 55 authorized positions to staff the fiscal divisions in the six regional offices.

The ODS Fiscal Division formulates the DoDDS budget, develops and monitors operating budget plans for the regions reviews accounting operations, and oversees fiscal reporting requirements. Regional office fiscal divisions develop budget estimates for their respective regions, administer operating budget plans, issue and monitor budget plans for individual schools, and maintain accounting records under policies and procedures promulgated by the central office.

THE BUDGET

The DoDDS budget includes funds from three separate DOD appropriations: Operations and Maintenance (O&M), Military Construction (MILCON), and Procurement. The DoDDS budget request is jointly reviewed by the Office of the Secretary of Defense (OSD) and the Office of Management and Budget (OMB) and then submitted to the Congress as part of the total DOD budget request for each of the three appropriations. The Congress appropriates DoDDS funds within the three separate DOD appropriations.

The following table shows the DoDDS budget for each of the three appropriations over a 4-year period:

Fiscal year	O&M ($000)	MILCON ($000)	Procurement ($000)	Total ($000)
1979 ---	313,644	48,961	147	362,700
1980 ---	338,846	15,225	996	355,067
1981 ---	364,499	48,351	811	413,661
1982 ---	419,639	24,300	5,706	449,645

DoDDS is eligible for additional Federal support from the foreign currency fluctuation fund administered by DOD. This fund provides additional resources to DOD activities when the value of the dollar falls in relation to the foreign currencies of those countries where DOD components administer programs.

DoDDS is also eligible for additional Federal education assistance under certain programs administered by ED. For example, Public Law 95-561 expressly provides for allotments to be made to DoDDS under title IV, section 403(c) and title IX, section 906(a)(1)(c) of the Elementary and Secondary Education Act (ESEA). DoDDS has historically declined Federal education assistance authorized under these programs, citing adequate funding under the DOD appropriations.

Budget Formulation

The ODS Fiscal Division issues guidance to the regional offices each fiscal year regarding development of DoDDS budget estimates. The regional offices request each school or school complex to prepare budget estimates in accordance with the guidance promulgated by the central office. School principals prepare estimates of past year and current year expenditures as well as estimates of funding requirements for the budget year. The regional offices then incorporate the budget estimates from each of the schools in their respective jurisdictions into a single regional budget. The consolidated budgets from each region are submitted to the central office and serve as the basis for formulating a total DoDDS budget.

Budget estimates are prepared by the schools and consolidated by the regional offices between February and May of each fiscal year. The ODS Fiscal Division formulates a total DoDDS budget in June and July and submits a total budget request for each of the three appropriations to OSD in August and September.

The budget is formulated in an object-class format. Budget data are presented in four major functional categories: Administrative costs, education costs, logistics costs, and unique costs. The object-class format does not provide data on the costs and personnel associated with individual education programs.

Budget Allocation

The ODS Fiscal Division prepares an annual budget plan that serves as the basis for allocating the DoDDS appropriations to the six regions. The appropriations are then allocated through quarterly funding allowances. The regions sub-allocate program funds to each school or school complex through expense authorization documents. Ceilings are established in expense authorization documents for specific functional or expense categories. Likewise, floors (minimal funding levels) are established for certain activities. Floor funds may not be diverted to other program activities.

ODS uses the Quarterly Management Report to monitor compliance with the regions' annual budget plans. Each school or school complex prepares the Quarterly Management Report, which is submitted to the regional office within 30 days after the end of a fiscal quarter and then transmitted to ODS.

Public Law 95-561, title XIV, section 1409 requires the Director of DoDDS to establish a formula for determining the minimum allotment of funds necessary for operating each school in the system. The allotment formula is to be established by regulation, issued in accordance with section 431 of the General Education Provisions Act. In establishing the formula, the Director is expected to take into consideration the following:

- o The number of students served by the school and the size of the school.
- o Special cost factors for a school, including geographic isolation, a need for special staffing, transportation, education programs, and unusual food and housing costs.
- o The cost of providing high quality academic services.
- o Other appropriate factors.

FINANCIAL SUPPORT SERVICES

Payroll Support Services

The finance offices of the three military departments provide payroll services to DoDDS personnel in the central and regional offices and at school sites throughout the world. Payroll support services include maintaining employees' pay accounts and leave records, computing employee payrolls, and disbursing pay checks. These services are generally provided on a reimbursable basis in accordance with provisions stipulated in interservice support agreements.

There are 28 finance offices (13 Air Force, 11 Navy, 4 Army) that provide DoDDS with payroll support services. The distribution of finance offices by geographic location and military department is shown in appendix J.

The military departments maintain eight separate civilian payroll systems (5 Navy, 2 Army, 1 Air Force). The payroll systems are not standardized. There are also substantial differences between the pay and leave schedules for teachers and other DOD civilian employees, and each payroll system must be uniquely programed to accommodate transactions for teachers.

Payroll systems have not been programed to compute automatically all teacher pay and leave transactions. For example, payroll systems presently do not compute automatically the required salary adjustments that result from the annual teacher pay raise in April, which creates retroactive benefits and involves two fiscal year appropriations, and thus all subsequent salary adjustments are computed manually.

The military departments' finance offices do not have a sufficient volume of DoDDS payroll and leave transactions to justify the substantive modifications to automated civilian payroll systems that would be required to provide a totally automated processing capability for all DoDDS payroll transactions. The approximately 11,000 DoDDS employees represent a very small fraction of the total DOD civilian work force of nearly 1.4 million employees.

Certification and Disbursement

DoDDS payments are certified and DoDDS funds are disbursed by the various military department finance offices that provide fiscal support services to the school system. Military department disbursement officers are authorized both to certify payments and to disburse funds. The disbursing officers are, in most instances, held accountable and pecuniarily liable for the legality, propriety, and correctness of the payments. (In non-DOD agencies, such as ED, payments are certified by authorized certifying officers, who are employees of their respective agencies, and then presented to disbursing officers in the Treasury Department for the actual disbursement of agency funds. Accountability and liability for improper payments rests with the certifying officer.)

The processing of DoDDS disbursement transactions is initiated by disbursing officers in the various finance offices. Disbursing officers report the transactions with supporting documentation to their respective military department accounting and finance centers.

The following military department accounting and finance centers consolidate disbursement reports:

- U.S. Army Finance and Accounting Center (USAFAC), Indianapolis, Ind.
- Air Force Accounting and Finance Center (AFAFC), Denver, Colo.
- Navy Accounting and Finance Center (NAFC), Washington, D.C.

The accounting and finance centers then submit consolidated disbursement reports to the Treasury Department. Chart 1 shows the reporting relationships between DoDDS, accounting and finance offices, accounting and finance centers, and the Treasury Department.

Chart 1. Reporting relationships between DoDDS, accounting and finance offices, accounting and finance centers, and the Treasury Department

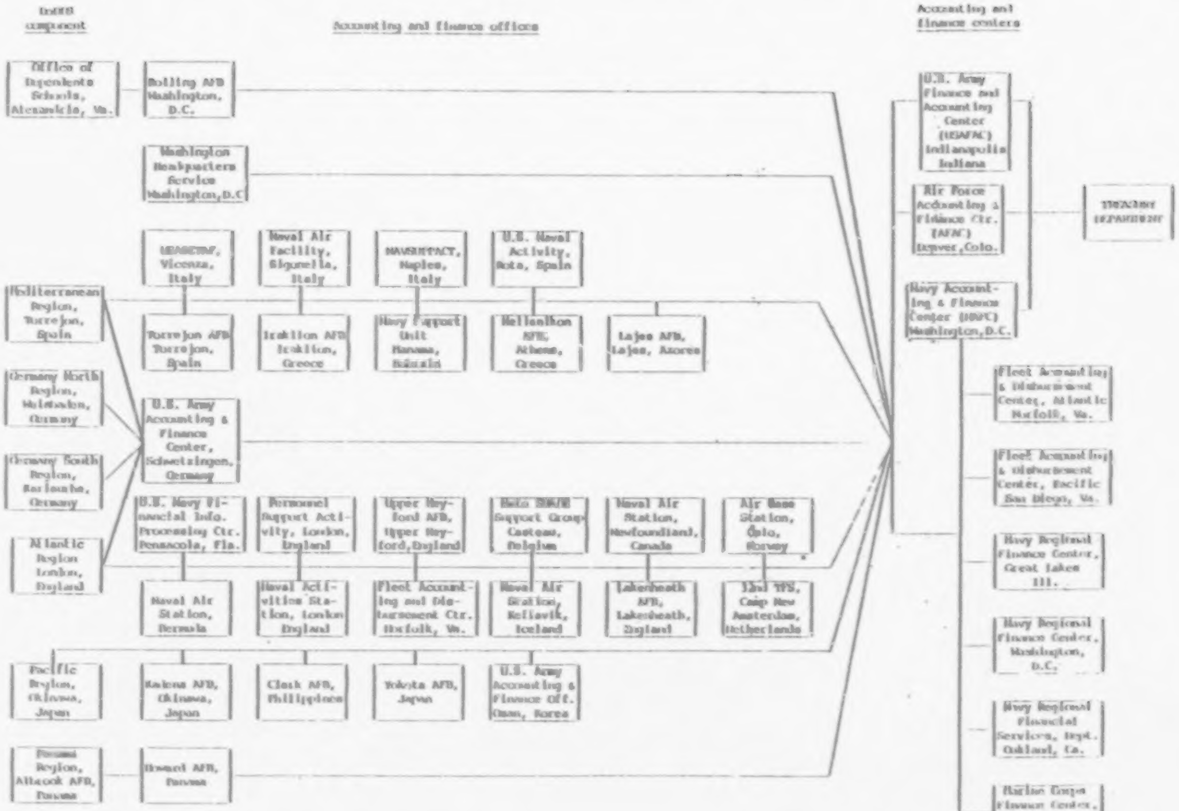
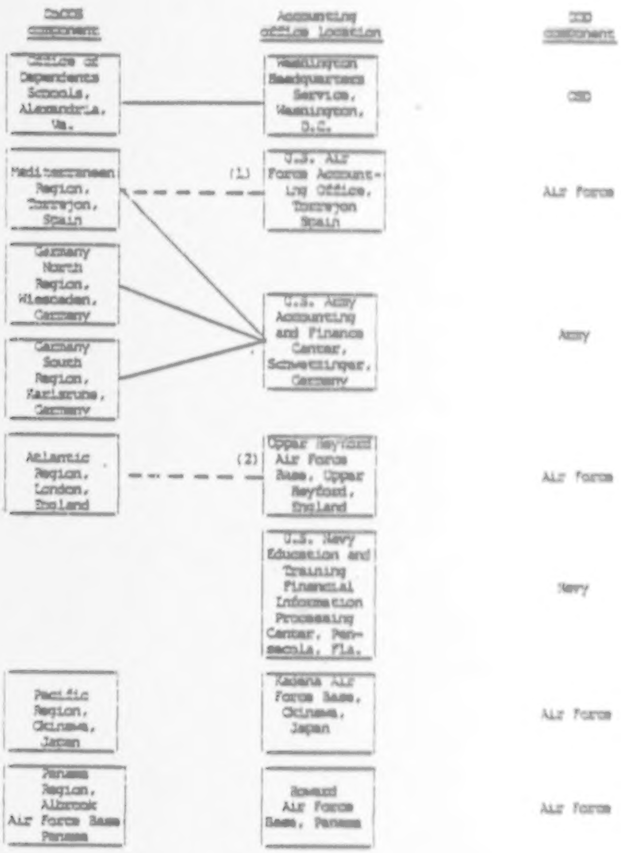

DoDDS component
Accounting and finance offices
Accounting and finance centers
Office of Dependents Schools, Alexandria, Va.
Bolling AFB Washington, D.C.
Washington Headquarters Service Washington, D.C
USASETAF, Vicenza, Italy
Naval Air Facility, Sigonella, Italy
NAVSUPPACT, Naples, Italy
U.S. Naval Activity, Rota, Spain
Mediterranean Region, Torrejon, Spain
Torrejon AFB Torrejon, Spain
Iraklion AFB Iraklion, Greece
Navy Support Unit Manama, Bahrain
Hellenikon AFB, Athens, Greece
Lajes AFB, Lajes, Azores
Germany North Region, Wiesbaden, Germany
U.S. Army Accounting & Finance Center, Schwetzingen, Germany
Germany South Region, Karlsruhe, Germany
Atlantic Region London, England
U.S. Navy Financial Info. Processing Ctr. Pensacola, Fla.
Personnel Support Activity, London, England
Upper Heyford AFB, Upper Heyford, England
Hq SHAPE Support Group Casteau, Belgium
Naval Air Station, Newfoundland, Canada
Air Base Station, Oslo, Norway
Naval Air Station, Bermuda
Naval Activities Station, London England
Fleet Accounting and Disbursement Ctr. Norfolk, Va.
Naval Air Station, Keflavik, Iceland
Lakenheath AFB, Lakenheath, England
32nd TFS, Camp New Amsterdam, Netherlands
Pacific Region, Okinawa, Japan
Kadena AFB, Okinawa, Japan
Clark AFB, Philippines
Yokota AFB, Japan
U.S. Army Accounting & Finance Off. Osan, Korea
Panama Region, Albrook AFB, Panama
Howard AFB, Panama
U.S. Army Finance and Accounting Center (USAFAC) Indianapolis Indiana
Air Force Accounting & Finance Ctr. (AFAC) Denver, Colo.
Navy Accounting & Finance Center (NAFC) Washington, D.C.
TREASURY DEPARTMENT
Fleet Accounting & Disbursement Center, Atlantic Norfolk, Va.
Fleet Accounting & Disbursement Center, Pacific San Diego, Ca.
Navy Regional Finance Center, Great Lakes Ill.
Navy Regional Finance Center, Washington, D.C.
Navy Regional Financial Services, Dept. Oakland, Ca.
Marine Corps Finance Center, Kansas City, Mo.

Chart 2. Distribution of accounting offices by geographical location and DOD component


DoDDS component
Accounting office location
DOD component
Office of Dependents Schools, Alexandria, Va.
Washington Headquarters Service, Washington, D.C.
OSD
Mediterranean Region, Torrejon, Spain
(1)
U.S. Air Force Accounting Office, Torrejon Spain
Air Force
Germany North Region, Wiesbaden, Germany
Germany South Region, Karlsruhe, Germany
U.S. Army Accounting and Finance Center, Schwetzinger, Germany
Army
Atlantic Region, London, England
(2)
Upper Heyford Air Force Base, Upper Heyford, England
Air Force
U.S. Navy Education and Training Financial Information Processing Center, Pensacola, Fla.
Navy
Pacific Region, Okinawa, Japan
Kadena Air Force Base, Okinawa, Japan
Air Force
Panama Region, Albrook Air Force Base Panama
Howard Air Force Base, Panama
Air Force

[1] Phase-in of accounting support to the Mediterranean region by Torrejon and phase-out of accounting support to the Mediterranean region by Schwetzingen is projected for Sept. 30, 1981.

[2] Phase-in of accounting support to the Atlantic region by Upper Heyford and phase-out of accounting support to the Atlantic region by Schwetzingen and Pensacola is projected for Sept. 30, 1981.

Procurement Services

The Defense General Supply Center (DGSC), a component of the Defense Logistics Agency (DLA), provides DoDDS with basic procurement services on a nonreimbursable basis. DGSC purchases educational materials requisitioned by DoDDS, arranges for vendor payments, bills the schools, and maintains accounting records.

DGSC estimates that it processed 477,000 requisition lines for DoDDS in FY 1980 and 55 authorized positions are currently assigned to the DGSC educational materials section that provides DoDDS with these procurement services. (There is a more complete discussion of procurement services in chapter V.)

Accounting Support Services

ODS receives accounting support services from the Washington Headquarters Service (WHS), a component of OSD. These services are provided on a nonreimbursable basis.

The six DoDDS regional offices and each school or school complex receive accounting support services from the military department that is the dominant servicing component in areas where there are DoDDS activities. These services are generally provided to DoDDS on a reimbursable basis in accordance with provisions stipulated in interservice support agreements.

Four geographically disbursed accounting offices employ four different accounting systems (1 Navy, 1 Army, 1 Air Force, 1 WHS) to account for DoDDS funds. Chart 2 shows the distribution of accounting offices supporting DoDDS activities by geographic location and DOD component.

Audits

DoDDS does not have an internal audit capability. Audits of selected aspects of the DoDDS system are performed periodically by the Defense Audit Service (DAS) and the General Accounting Office (GAO). In addition, the DoDDS system is included in audits of individual military installations and reviews of support functions conducted by DAS, the GAO, and the military department audit agencies.

DAS audits of the DoDDS system are generally conducted at the request of the Director, DoDDS, and focus on selected features of the school system. Recent DAS audits of DoDDS include the following:

- Report on the Review of the Cost of Busing Department of Defense Dependents Schools Students in the European Area (August 17, 1979)
- Report on the Review of the Department of Defense Dependents Schools Dormitory Operations and Tuition School Programs in the European Region (January 25, 1979)
- Report on the Review of the Department of Defense Dependents Schools Reorganization Plan (June 15, 1978)
- Report on the Audit of the DoD Teacher Retroactive Pay Adjustment for FY 1976 (May 25, 1977)

DAS recently initiated a review of DOD's systems for obligating and controlling expenditures of funds to support the dependents school system. The review will be performed during the 6-month period from January through June 1981.

The GAO conducted a major review of the financial management of the DoDDS system in 1976 and 1977 at the request of the Chairman of the Senate Committee on Appropriations. The request resulted from the committee's concern about the program's management and rapidly rising costs. The GAO report, Financial Management of Overseas Dependents Schools (February 1977), examined policies and procedures relating to financial management as well as logistical services, organizational structure, and staffing.

The military department audit agencies--the U.S. Army Audit Agency (AAA), the Air Force Audit Agency (AFAA), and the Naval Audit Service (NAS)--include DoDDS in their periodic single location audits of military installations and their multilocation audits of support functions. Recent military department audit agencies' reports that directly concern dependents schools include the following:

- AAA Report on the U.S. Military Community, Hanau, Germany (May 27, 1980)
- AAA Report on Civilian Pay, U.S. Army, Europe and the Seventh Army (May 10, 1979)
- AAA Report on the U.S. Military Community, Munich, Germany (February 20, 1977)
- AFAA Report on the Interservice Audit of Overseas Dependents Schools Support Agreements (October 27, 1976)
- AFAA Report on the Transportation of Dependent School Children (September 23, 1976)
- AAA Report on Reimbursments for School Bus Drivers, U.S. Army, Europe and the Seventh Army (July 24, 1976)

ANALYSIS

INTERNAL FISCAL FUNCTIONS

DoDDS central and regional office fiscal divisions are not adequately staffed to perform the wide range of budget and financial management functions associated with operating a large, geographically dispersed school system. The problem of understaffing is compounded by the lack of appropriately trained DoDDS personnel at the school level to effectively support central and regional office fiscal activities.

In the ODS Fiscal Division, only two staff are currently assigned to the budget branch that is responsible for formulating a budget of approximately $450 million, preparing departmental and congressional budget justifications, and monitoring the execution of regional office operating budget plans. Only one staff member is currently assigned to the management branch that is responsible for developing cost analyses for program planning. There are no ODS staff specifically assigned to monitor the DoDDS $35 million tuition-collection program.

In the regional offices, there are on the average nine staff assigned to each fiscal division. The staff are responsible for consolidating budget estimates for each of the 270 schools in the system, executing operating budget plans, and monitoring the financial support services, such as payroll and accounting, that are provided to DoDDS by the military departments.

At the school level, principals are responsible for developing individual school budget estimates, monitoring expense authorization documents, collecting tuition fees, and reviewing interservice support agreement costs. Principals traditionally have not been trained as financial managers, and the school system does not employ business managers, staff positions common in most other U.S. schools, to assist principals in performing these activities.

THE BUDGET

There are significant differences in the methodologies employed by the six DoDDS regions to compute budget estimates. Regional office budget data show that estimated funding requirements for specific categories of expenditures vary substantially from region to region and that the estimates are often highly disproportionate to the number of schools and students in each region. Although it is of course true that other factors besides number of schools and students are relevant (such as geographic dispersion of schools, cost of living indices, foreign currency fluctuation rates, and host nation salary scales), the disproportionate nature of regional budget estimates cannot be completely explained by these other factors. For example, regional office budget data for FY 1982 show the following budget estimates with number of schools and students for certain regions, by expenditure category:

	Budget estimate	Dependent students	Per pupil cost
Education supplies			
Mediterranean	$1,374,000	11,884	$115
Atlantic	734,000	15,005	48
Pacific	707,000	21,050	33
Inter-curricular programs			
Pacific	650,000	21,050	30
Germany South	406,000	33,625	12
Germany North	302,000	43,659	6
Audiovisual material			
Mediterranean	437,000	11,884	36
Germany South	840,000	33,625	24
Germany North	427,000	43,659	9
Textbooks			
Pacific	1,265,000	21,050	60
Panama	375,000	5,375	46
Atlantic	339,000	15,005	22

Furthermore, DoDDS has not developed a specific budget allotment formula, as required by Public Law 95-561, title XIV, section 1409, for determining the minimum funding necessary for operating each school in the system. The absence of an allotment formula restricts opportunities for estimating resource requirements and distributing DoDDS funds on an equitable basis.

The format of the DoDDS budget is an additional limitation to determining the appropriate level of funding and personnel necessary for operating each school in the system. The current budget format is structured by functional categories of expenditures (e.g., teacher salaries, textbooks) and does not identify specific educational program and staffing costs.

A budget format structured by program-based categories of expenditures (e.g., compensatory education, vocational education) would facilitate a more equitable allotment of funds and personnel for operating each school by providing a mechanism to identify special educational cost factors. A program-based budget format would also help track the implementation of education programs required by Public Law 95-561, title XIV, section 1402.

FINANCIAL SUPPORT SERVICES

The six DoDDS regional offices and each school or school complex are entirely reliant upon the military departments for payroll and accounting support services. These services are provided by the military department that is the dominant servicing component in areas where there are DoDDS activities. Traditionally, these services have been provided largely by the Army in the European regions, the Air Force and Navy in the Atlantic and Panama regions, and the Air Force in the Pacific region.

The military departments' payroll and accounting systems are not standardized. The financial management of DoDDS resources, therefore, is largely dependent on several incompatible fiscal support systems.

DoDDS reliance on multiple, non-standardized fiscal support systems has contributed to a situation where appropriate financial data to effectively manage the program's resources are not readily available. For example:

- Accounting expense data are often accumulated and reported in categories that are not totally compatible with DoDDS data requirements.
- Accounting reports are often untimely and not always accurate.
- There are considerable backlogs of unprocessed financial transactions and unliquidated obligations.
- Reconciliations of accounting records are often necessary to determine actual obligations and expenditures.

Development of a worldwide single-service financial support system for DoDDS is an alternative to continuation of the tri-service support systems that are currently in place. A single-service support system would provide DoDDS with a more responsive, uniform management system based on compatible financial data.

There are problems, however, with assigning to a single military department responsibility for providing DoDDS with financial support services on a worldwide basis. The Defense Audit Service (DAS), in a 1978 report on the DoDDS reorganization plan, indicated that considerable effectiveness, experience, and expertise would be lost by excluding a military department that is dominant within a DoDDS region from providing support services. For example, assigning worldwide responsibility for fiscal support to the Air Force would eliminate the Army as a provider of financial support services in Germany, where the Army is the dominant service and approximately 75 percent of the DoDDS population is located. Similarly, designating the Army as the sole agent for providing DoDDS with financial support services would place it in the difficult position of being responsible for servicing geographic areas, like the Pacific, in which it has neither adequate resources nor experience.

DAS recommended that the dominant service in each of the regions be designated the executive agent to provide DoDDS with fiscal support services. Subsequently, the Army has been designated executive agent in the two regions in Germany and the Air Force has been designated executive agent in the Pacific. Negotiations are currently underway to designate the Air Force as the executive agent responsible for providing accounting support services to the Atlantic, Mediterranean, and Panama regions. The Navy is no longer dominant in any of the DoDDS regions.

The ODS initiative to consolidate military department responsibility for providing DoDDS with financial support services will facilitate development of a more uniform and effective financial management system. The consolidation of responsibility will reduce the ODS span of control vis-a-vis fiscal support services to a level where it is practicable to incorporate appropriate fund control techniques into existing financial management systems.

Meanwhile, an intensified effort needs to be made to identify the actual value of reimbursable and nonreimbursable support services provided to DoDDS by the dominant servicing components. Many expenses for the overseas school system have been incurred in the past by the dominant servicing components on a nonreimbursable or less than fully reimbursable basis and, as a result, the complete cost of the school system's operation has never been included in its budget or reported elsewhere.

The 1977 GAO report on the financial management of the overseas dependents schools found that cost comparisons between the dependents school system and stateside school systems cannot be readily made because, in part, all costs of operating DoDDS have not been identified and reported and, furthermore, the reported costs were unreliable because the data collection system did not provide accurate information. The GAO report recommended that the Secretary of Defense require ODS to identify and report all costs in order to determine the total cost of operating the schools and to take action to discipline the system to ensure the reliability of cost and budget information.

Two 1979 audit reports issued by AAA indicated that certain major reimbursable costs of operating the school system were still not being paid by DoDDS. An AAA audit report on civilian pay found that the U.S. Army in Europe (USAREUR) did not, as of February 1979, receive any reimbursements for logistical support provided to DODDS in the areas of accounting, finance, and civilian personnel services. An AAA audit report on the U.S. military community at Munich, Germany, found that USAREUR also did not obtain full reimbursement from DoDDS for bus transportation provided to school children.

RECOMMENDATIONS

1. By FY 1984 a program-based budget and accounting system should be developed that clearly identifies specific educational program and staffing cost factors.

   Development of such a system would satisfy the requirement in Public Law 95-561, title XIV, section 1409, that a budget allotment formula be developed for determining the minimum allotment of funds necessary for operating each school; assure that funding and staffing for major programs such as special education and compensatory education are clearly identified and funded; and help management to track program and individual school performance against clear objectives and resource levels.

2. The total cost of operating the school system should be determined by identifying and reporting all costs.

   Cost determination is particularly important in setting rates to be charged to tuition-paying students and in conducting cost comparisons between the dependents education system and stateside school systems.

3. A tuition-collection unit should be established in the DoDDS central office to develop cash management policies and procedures in order to effectively monitor the tuition-collection program.

   Each year DoDDS collects approximately $35 million in tuition payments from other Federal agencies and private individuals. More effective management of the tuition-collection program would save money through earlier collection of payments and a reduction in the incidence of nonpayments.

4. A financial management training program for school principals should be developed and implemented.

   Improved financial management training for principals is needed to ensure that principals are familiar with the total cost of operating schools and better prepared to review cost estimates and negotiate appropriate changes to interservice support agreements. The recent establishment of local school advisory committees will also require principals to explain and justify the total budget for their respective schools.

TRANSFER ARRANGEMENTS

It is proposed that, in order to effect the transfer of functions specified in section 302 of the Department of Education Organization Act (Public Law 96-88), an interagency agreement be executed by the Department of Defense and the Department of Education. This interagency agreement will specify the Department of Defense as responsible for providing financial support services, including payroll and accounting support, on a reimbursable basis to the overseas dependents education system. The Department of Defense will provide financial support services comparable in manner and degree to that provided prior to the effective date of the proposed transfer of section 302 of Public Law 96-88.

It is also proposed that, pursuant to the transfer of functions in section 302 of Public Law 96-88, the interagency agreement executed by the Department of Defense and the Department of Education specify the Office of the Inspector General, Department of Education, as the agency with primary responsibility for audit-related functions in respect to the overseas dependents school system. It is proposed that the interagency agreement include a memorandum of understanding between the Defense Audit Service, the military department audit agencies, and the Office of the Inspector General to ensure interdepartmental coordination of audits and reviews of overseas dependents schools programs and operations. A draft of this interagency agreement is included in appendix K.

CHAPTER V

LOGISTICAL SUPPORT SERVICES

DESCRIPTION

INTERNAL LOGISTICS FUNCTIONS

The Department of Defense Dependents Schools (DoDDS) rely totally on the military departments and other DOD components for logistical support services. These services include the following: Procurement of educational materials; transportation of students, personnel, and cargo; construction and maintenance of school facilities; and personnel support and financial services (discussed in chapters III and IV). These services are generally provided to DoDDS by DOD components on a reimbursable basis.

Overall responsibility for coordinating and monitoring DoDDS logistical support services rests with the Logistics Division in the school system's central office, the Office of Dependents Schools (ODS) in Alexandria, Va. The ODS Logistics Division is supported by counterpart logistics divisions in each of the school system's six overseas regional offices.

The ODS Logistics Division has three branches (supply and services, facilities, and transportation and student feeding) and an authorized staff of 13 employees. There are 71 authorized positions to staff the logistics divisions in the six regional offices.

INTERSERVICE SUPPORT AGREEMENTS

Each school in the DoDDS system receives reimbursable and nonreimbursable logistical support services from the military department or other DOD agency that is the dominant servicing component in the area where the school is located. These services are provided in accordance with provisions stipulated in interservice support agreements negotiated between each school or school complex and its dominant servicing component.

The number of interservice support agreements between DoDDS and DOD components fluctuates between 65 and 130 as old agreements terminate and new agreements are negotiated on an ongoing basis. ODS support agreement data for 1980 show that DoDDS had 121 separate interservice support agreements in effect with DOD components that year. The following tabulation shows the number of agreements DoDDS had in 1980 with each military department and other DOD agencies:

Army	57
Air Force	41
Navy	17
Marine Corps	4
Other DOD agencies	2
Total	121

The ODS Logistics Division estimates that the cost of funding major reimbursable logistical support requirements identified in interservice support agreements for FY 1982 will be $117.6 million and that 1,274 staff positions in the military departments will be required to provide these services. The estimated FY 1982 cost and staffing requirements for each of the various categories of reimbursable support services are shown in appendix L.

The ODS Logistics Division estimates the value of all nonreimbursable support services identified in interservice support agreements for FY 1982 at $1.5 million. The various categories of nonreimbursable support services are shown in appendix M.

Interservice support agreements are negotiated and executed in accordance with uniform policies and procedures established by the Defense Retail Interservice Support (DRIS) program. The DRIS program, administered by the Defense Logistics Agency (DLA), was established by DOD to coordinate the provision of recurring support services from one DOD component to another and to other Federal agencies and departments in order to eliminate duplicate supporting activities and thus reduce costs.

School principals initiate interservice support agreement negotiations by furnishing the prospective supplying component with a written statement of requirements in the form of a draft support agreement or letter of request. The supplying component develops an estimate of the reimbursable and nonreimbursable costs and staff positions that will be required to provide the requested services. Interservice support agreements are finalized on a standard authenticating document (DD Form 1144) that identifies the detailed arrangements negotiated between the two parties for each functional area of support involved in the agreement.

Interservice support agreements are recognized as binding agreements to provide support only and not as a basis for establishing "orders received," against which costs or earnings can be recorded and billings or collections made. Funding amounts indicated on interservice support agreements are targets for programing only and are not generally funding limitations. Changes in funding amounts do not require interservice support agreements to be renegotiated, changed, or modified. Adjustments in funding amounts reflected on interservice support agreements are made during the biennial review and update.

A Military Interdepartmental Purchase Request (MIPR) is used to finance interservice support agreements and reflects the actual cost of interservice support. Costs listed on MIPR's are expressed in dollars. When foreign currencies are involved, a DOD prescribed rate of exchange is used.

MIPR's are prepared by school principals and staff of DOD components providing support services and executed in accordance with the support arrangements set forth in interservice support agreements. School principals are required to validate the receipt of support services before they certify reimbursable billing vouchers for payment.

PROCUREMENT OF EDUCATIONAL MATERIALS

Educational Materials Requirements

Each school in the DoDDS system identifies its annual educational materials requirements. Schools request funding for six major categories of educational materials: Textbooks, library books, instructional materials, audiovisual materials, supplies, and educational equipment. Most educational materials are purchased in the United States.

The DoDDS FY 1982 budget request includes $10.8 million for educational materials. The following table shows the FY 1982 budget request for each of the six categories of educational materials:

Textbooks	$2,805,000
Library books	1,075,000
Instructional materials	2,267,000
Audiovisual materials	978,000
Supplies	3,185,000
Educational equipment	510,000
Total	$10,820,000

The ODS Fiscal and Logistics Divisions, in coordination with the Curriculum Development Committee (CDC), develop guidelines and establish procedures for procuring educational materials. The ODS Fiscal Division allocates funds for educational materials to the regional offices and they sub-allocate funds to each school or school complex. The ODS Logistics Division and the CDC develop guidelines that prescribe recommended quantities of essential materials on a per school, per classroom, per student, and per teacher work-station basis. The ODS Logistics Division also establishes uniform requisition procedures, which are promulgated in a materials management manual.

Requisitions and Procurement

Historically, dependents schools in the European region centrally initiated educational materials requisitions from the regional office in Karlsruhe, Germany. The regional office prepared requisitions for all schools in the region based on the previous year's demand, current stock levels, and the schools' projections for the coming year. The regional office consolidated numerous small requests from the individual schools for various educational materials into one large requisition for each item.

Requisitions were then sent to the Defense General Supply Center (DGSC) in Richmond, Va., for processing. DGSC, a component of the Defense Logistics Acency (DLA) and a principal procurement agent for all DOD activities, purchased the educational materials and arranged for shipment, vendor payment, and billing the schools.

Most vendor deliveries for DoDDS European schools went to the Military Ocean Terminal, Bayonne, N.J., for consolidation into sea vans, were shipped to the Military Ocean Terminal at Bremerhaven, Germany, and then were trucked to a central supply warehouse at Nahbollenbach, Germany. This process took an average of 8 months from requisition to receipt at Nahbollenbach, and at least an additional month to ship the materials from Nahbollenbach to the individual schools.

Dependents schools in the Atlantic and Pacific regions also have traditionally requisitioned materials through DGSC. In contrast to requisition procedures in the European region, however, Atlantic and Pacific regional offices generally did not consolidate requisitions from the schools in their respective regions. The schools usually ordered educational materials individually from DGSC based on each school's requirements. Also, educational materials were generally shipped directly to the schools or to a local warehouse. Consequently, delivery time was substantially shorter in the Atlantic and Pacific regions than in the European region.

In 1977, ODS directed the European region to request direct shipment from vendors to the schools whenever practicable and to phase-down the Nahbollenbach warehouse in order to reduce delivery time. These two actions, together with subsequent reorganization of DoDDS from three to six regions, have created a substantial increase in the volume of educational materials requisitions processed by DGSC.

DGSC no longer receives any large, consolidated requisitions for educational materials. Instead, consolidated requisitions have been replaced by numerous small requisitions for direct vendor delivery to individual schools or to the six miniwarehouses that have been established in the regions.

In FY 1979, DGSC processed an estimated 284,000 requisition lines for DoDDS. (A requisition line is defined as one item or stock number shipped to one address. For example, a request for 25 third-grade math textbooks for a specific school would be considered a single requisition line.) In FY 1980, DGSC processed an estimated 477,000 requisition lines for DoDDS. This represents a 68 percent increase from FY 1979 to FY 1980 in the DGSC educational services section workload.

The number of authorized positions for DGSC's educational services section increased from 31 positions in 1979 to 55 positions in 1980. There are now 30 positions in the procurement unit that processes educational materials requisitions and an additional 25 positions in the accounting and finance unit that processes payment of vendors' invoices and bills DoDDS. DGSC procurement support to DoDDS is provided on a nonreimbursable basis.

In 1980, ODS in coordination with DLA/DGSC modified the procurement system to permit regional offices to order directly from U.S. vendors a large number of educational materials, including library books and textbooks. Requisitions for these materials, known collectively as requirements type contracts (RTC's), are the most voluminous type of order placed by the school system, comprising over 50 percent of DoDDS requisition lines. Once filled, RTC orders are shipped directly to individual school sites. This modified procurement procedure reduces both DGSC's workload and delivery time. A summary of current procedures for procuring RTC items and other educational materials is shown in appendix N.

TRANSPORTATION

Student Bus Transportation

DoDDS ensures that transportation is available to bus students to and from the system's individual schools. DoDDS has no in-house transportation capability and relies totally on the dominant servicing components to furnish bus transportation on a reimbursable basis. Arrangements for bus transportation are detailed in interservice support agreements.

The servicing components provide bus transportation using in-house resources, commercial contractor resources, or a combination of both. The majority of bus transportation arrangements are with commercial contractors. When in-house resources are used, the servicing component uses DOD-owned buses operated by locally hired bus drivers.

The cost of busing comprises the largest percentage of the annual DoDDS operations and maintenance budget except for salaries. The ODS Logistics Division estimates that the cost of providing bus transportation in FY 1982, based on ODS interservice support agreement data, will be $37.1 million and that 489 military department personnel, in addition to locally hired and contract service bus drivers, will be required to provide this service.

Transportation Allowances for Dormitory Students

DoDDS is also responsible for providing transportation allowances to dependent students attending the system's dormitory schools. Dependents attending a 5-day-a-week dormitory school receive a transportation allowance for weekly trips to and from such a school during the school year. Dependents attending a 7-day-a-week dormitory school receive a transportation allowance for three trips to and from such a school during the school year. The estimated cost of providing transportation to all dependents attending dormitory schools in FY 1982 is $400,000.

Transportation of Personnel and Cargo

DoDDS central and regional office staff and school-level employees use the services of the Military Airlift Command (MAC) and the Military Sealift Command (MSC), two components of the Defense Transportation System (DTS), for mission-related traffic. DoDDS reimburses the DTS for the movement of its personnel at rates prescribed for DOD agencies. DoDDS-sponsored cargo shipments are transported via DTS at the expense of the military departments.

Permanent change of station (PCS) costs for DoDDS administrators and teachers represent a significant transportation expense in the school system's annual budget. The ODS Fiscal Division estimates PCS costs for FY 1982 at $26 million.

Postal Service

DoDDS personnel are authorized to use the Military Postal System (MPS) for moving official and personal mail. DOD operates the MPS throughout most overseas areas as an extension of the U.S. Postal Service. DoDDS personnel use the MPS on a non-reimbursable basis, except for the payment of postage for personal mail at rates that are established by the Postal Rate Commission and promulgated in the Domestic Mail Manual.

FACILITIES

Construction

Public Law 95-561, title XIV, section 1406 requires the President to include in his budget for each fiscal year a separate request for funds for construction of DoDDS facilities. The Congress authorizes school construction projects and appropriates funds for construction of DoDDS facilities.

Funds for DoDDS construction projects are included in the annual DOD military construction (MILCON) appropriation. The following tabulation shows the DoDDS MILCON appropriation over a 5-year period:

FY 77	$19,100,000
FY 78	17,000,000
FY 79	48,961,000
FY 80	15,225,000
FY 81	48,351,000

DoDDS also receives funds for construction projects from four additional DOD sources: A Planning and Design Fund, an Emergency Construction Fund, an Exigent Minor Construction Fund, and a Foreign Currency Fluctuation Fund. Financial support received from these sources by DoDDS for construction projects in FY 1981 is estimated at $25 million.

Support services for the design and construction of school facilities are provided to DoDDS by three military department engineering components on a reimbursable basis. The engineering components that provide these services are the Army Corps of Engineers, the Air Force Civil Engineers, and the Naval Facilities Engineering Command.

Many facilities in the DoDDS system are substandard. In recent years, DOD has been criticized for this situation by the Congress and the North Central Association of Colleges and Schools (NCA), which accredits these schools. A House Armed Services Committee Report, dated May 25, 1977, stated that "the schools suffer from deficient facilities to a degree which would not be tolerated within U.S. borders and this deficiency seems to be widespread." DoDDS schools have been cited by NCA on several occasions because facilities were found to be below acceptable educational standards.

During the past 2 years, DoDDS has conducted an assessment of the condition of its school facilities and identified current essential requirements for school construction projects totaling approximately $500 million. DoDDS designed a 5-year major construction program in 1980 to address the problem of deficient, substandard facilities.

Ownership and Use of Facilities

Titles to facilities used by DoDDS are generally held by the dominant servicing components. These titles revert to host nation governments when activities conducted by the dominant servicing components are discontinued.

DoDDS uses facilities controlled by dominant servicing components on a nonreimbursable basis. However, DoDDS does provide funding for the maintenance and repair of these facilities and for custodial services and utilities.

Public Law 96-88, title XIV, section 419 authorizes the Secretary of Education to use, with or without reimbursement, facilities of any agency or instrumentality of the U.S. Government or of any foreign government, in carrying out any function of the Department. Proposed transfer arrangements stipulate that:

- DOD components will continue to hold title to DOD facilities used by dependents schools.
- Dependents schools will continue to use facilities controlled by DOD components on a nonreimbursable basis.
- ED will provide funding for non-cyclical maintenance and repair of such facilities, custodial services, and utilities.

Maintenance, Repair, and Custodial Services

Facilities maintenance, repair, and custodial services are provided to DoDDS on a reimbursable basis by the dominant servicing component in each area where there are DoDDS activities. Detailed arrangements for providing these services are stipulated in interservice support agreements.

The ODS Logistics Division estimates that the FY 1982 reimbursable cost of maintenance and repair services, based on current interservice support agreement data, will be $17.7 million and that 215 military department personnel, in addition to contract services personnel, will be required to provide these services. The division further estimates that the FY 1982 reimbursable cost of custodial services will be an additional $14.5 million and that 151 military department personnel, in addition to contract service personnel, will be required to provide these services.

Asbestos

In 1980 ODS requested the dominant servicing components providing logistical support to DoDDS activities to undertake an asbestos detection program in all DoDDS facilities. The program involves five steps: (1) Onsite inspections, (2) samples, (3) analysis, (4) exposure assessment, and (5) corrective action.

The asbestos detection program has been completed in most DoDDS facilities, and no substantively toxic levels of asbestos have been found. In those instances where asbestos was detected, corrective actions have been taken to remove, incapsulate, or enclose the material.

STUDENT FOOD SERVICES

Public Law 95-561, title XIV, section 1408 amended the National School Lunch Act and the Child Nutrition Act of 1966 to authorize DOD to obtain U.S. Department of Agriculture (USDA) funding and surplus agricultural commodities for student lunch and breakfast programs. Prior to enactment of that legislation, DOD was eligible to participate only in the USDA surplus commodities program.

The Office of the Secretary of Defense (OSD) commissioned the Logistics Management Institute (LMI) in 1978 to conduct a study of alternatives for operating and administering a systemwide student meal program. The LMI study, completed in 1979, presented an analysis of estimated investment and operating costs and recommended that overall authority and responsibility for the student meal program be assumed by the Office of the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics (OASD/MRA&L).

In 1980, a Memorandum of Agreement was executed between USDA's Food and Nutrition Service and OASD (MRA&L) regarding the administration of school lunch and breakfast programs. The military departments subsequently designated the following components to manage and operate student meal programs in the DoDDS system for their respective military services:

- Army and Air Force Exchange Service (AAFES)
- Navy Resale and Services Support Office (NAVRESSO)
- Marine Corps Exchange Service Branch

ANALYSIS

INTERSERVICE SUPPORT AGREEMENTS

The cost of funding reimbursable support services under arrangements stipulated in interservice support agreements consumes more than 25 percent of the annual DoDDS budget. The ODS Logistics Division estimates that the cost of funding major reimbursable support services identified in support agreements for FY 1982 will be $117.6 million and that 1,274 staff positions in the military departments will be required to provide these services.

Interservice support agreements do not provide ODS with a reliable index for determining and controlling the actual cost of reimbursable support services. The costs depicted in support agreements are computed by the dominant servicing components without direct participation from DoDDS staff. Support agreement cost computations are considered estimates and subject to change, but support agreements are generally not renegotiated when cost estimates are adjusted.

There is no complete inventory of interservice support agreements readily available to facilitate ODS management control over the cost of support services. The ODS Logistics Division does not maintain a complete file of current DoDDS support agreements and thus must rely on the six overseas regional office logistics divisions for support agreement data. Moreover, the Defense Logistics Service Center (DLSC), the DLA component assigned responsibility for maintaining computerized records of all DRIS program agreements, also does not have a complete file on DoDDS support agreements.

There are significant differences between support agreement data maintained by ODS and DLSC. A comparison of ODS and DLSC support agreement data for FY 1980 shows the ODS cost and staffing estimate to be $22.8 million and 1,334 staff positions higher than the DLSC estimate. The following tabulation shows actual ODS and DLSC estimates of support costs and staffing requirements for FY 1980:

Data source	Dollar costs	Staffing requirements
ODS -------	$71,642,400	1,794.2 positions
DLSC ------	$48,865,356	459.8 positions

There are also significant differences in the methodologies employed by the dominant servicing components in the various DoDDS regions to compute reimbursable support agreement costs and estimates of the staffing required to provide support services. ODS support agreement data show that costs and staffing requirements for specific categories of support services vary substantially from region to region and that both the costs and staffing requirements are often highly disproportionate to the number of schools in each region. Although it is of course true that other factors besides number of schools are relevant (such as number of students, geographic dispersion of schools, cost of living indices, foreign currency fluctuation rates, host nation salary scales, and degree of reliance on contractual services and rental facilities), the disproportionate nature of costs and staffing requirements cannot be completely explained by these other factors. For example, ODS FY 1982 support agreement data show the following reimbursable support costs and staffing requirements with number of schools for certain regions, by support category:

Reimbursable support costs

	Cost	Schools
Engineering support		
Germany North ------	$5,600,000	76
Germany South ------	325,000	64
Atlantic -----------	0	39
Mediterranean ------	0	36
Utilities services		
Panama -------------	2,500,000	16
Atlantic -----------	1,500,000	39
Maintenance and repair		
Germany North ------	11,600,000	76
Germany South ------	1,300,000	64
Printing and reproduction		
Panama -------------	60,000	16
Atlantic -----------	4,600	39

Staffing requirements

	Staff	Schools
Custodial services		
Panama -------------	66	16
Germany South ------	26	64
Civilian personnel services		
Germany North ------	54	76
Germany South ------	17	64

	Staff	Schools
Maintenance and repair		
Panama -------------	48	16
Atlantic -----------	9	39
Utilities services		
Germany North ------	25	76
Mediterranean ------	4	36
Atlantic -----------	*	39
Pacific ------------	*	40
Panama -------------	*	16

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*No personnel identified

All factors that contribute to support agreement costs and staffing requirements need to be included in a standardized methodology for computing support agreement resource requirements in order to determine the actual value of services provided to the school system. A standardized methodology for computing support agreement resource requirements must then be applied uniformly by the dominant servicing components in order to ensure that the school system's resources are distributed equitably among the various regions and schools.

PROCUREMENT OF EDUCATIONAL MATERIALS

The procurement system that was in place in the European region until the DoDDS reorganization plan was implemented did not adequately meet the needs of the dependents schools located in that area. There were serious problems with the quantity and quality of educational materials requisitioned, excessive costs, and protracted delivery schedules.

In 1978, the Defense Audit Service (DAS) reviewed the European region's procurement system in a report on the DoDDS reorganization plan. DAS found that:

- Little consideration was given to the specific educational materials requirements of individual schools.
- The Nahbollenbach warehouse had an excessive inventory of certain educational materials, often because a large quantity of items in the warehouse were bought based on previous demand and were often not requested again for use by the schools.
- There were high handling costs associated with onloading operations at the Military Ocean Terminal at Bayonne, N.J., and offloading operations at the Military Ocean Terminal at Bremerhaven, Germany.

- The Nahbollenbach warehouse employed 32 above-school-level warehousemen to receive materials, stock items, and ship them to individual schools. Requisitioned items were handled at least three times before being received at the schools.
- The average delivery time from requisition to receipt at Nahbollenbach was 8 months. It took an additional month to ship materials from the warehouse to individual schools.

The 1978 DAS report concluded that the DoDDS procurement system should be modified to make it more responsive and less costly to the schools. DAS endorsed the concept of direct vendor deliveries to individual schools and the phase-out of the Nahbollenbach warehouse. DAS also recommended that DoDDS establish small regional warehouses to replace the Nahbollenbach facility and use the Military Standard Requisitioning and Issue Procedures (MILSTRIP) to requisition educational materials.

DAS concluded that implementation of MILSTRIP by DoDDS would result in substantial improvements to the current procurement system. MILSTRIP requisitions could be prepared at the school level and forwarded to the local servicing component where they would be keypunched and entered into the mechanized system. The requisition would be compared for availability of in-theater supplies. For those items not filled in-theater, the requisition would be automatically routed to a DOD inventory control point (ICP). The ICP would either fill the requisition from depot stock or procure the item for direct delivery to the schools, thereby saving packing and storage expenses at the Bayonne and Bremerhaven ocean terminals and the Nahbollenbach warehouse.

For school-unique National Stock Number (NSN) items, the Defense Automated Addressing System (DAAS) could route the MILSTRIP requisition to DGSC. Since an NSN is compatible with DGSC's Standard Automatic Material Management System (SAMMS), the procurement of school-unique materials could in most cases be processed mechanically instead of manually, as DoDDS has traditionally processed them. Non-NSN requisitions would be sent by the schools to DGSC and processed manually for direct delivery to the schools.

OASD (MRA&L) also reviewed the DoDDS procurement system the following year and reported that it concurred with the major recommendations presented in the DAS study. Specifically, OASD (MRA&L) also recommended that DoDDS automate the procurement system whenever practicable, including the use of MILSTRIP single-line requisitioning via AUTODIN through DAAS, and develop a catalog of school items with standard prices.

A joint DLA/DGSC/ODS task group was formed to develop alternatives for implementing the DAS and OASD (MRA&L) recommendations. The task group issued a report in March 1980 that presented a comparative analysis of several procurement systems and recommended DGSC's SAMMS as the most viable alternative for automating the DoDDS procurement system. The task group concluded that the SAMMS alternative meets all DAS and OASD (MRA&L) recommendations and has the highest cost-benefit ratio of all the alternatives considered.

The automated features of the SAMMS alternative--AUTODIN transmission of MILSTRIP single-line requisitions through DAAS, direct requisitioning between schools and DGSC, and direct vendor delivery--would provide DoDDS with a substantially more responsive and cost-effective procurement system. Action should be taken as soon as practicable to implement this alternative.

TRANSPORTATION

Student Bus Transportation

The DoDDS student busing program is the most costly support service furnished to the school system by the dominant servicing components. ODS estimates that the cost of providing bus transportation in FY 1982, based on ODS interservice support agreement data, will be $37.1 million and that 489 military department personnel, in addition to locally hired and contract service bus drivers, will be required to provide this service.

Both DOD audit agencies and the GAO have reviewed the DoDDS student busing program on various occasions over the past several years. They found that DoDDS was not accurately reimbursing the dominant servicing components for transportation costs and that in general the student busing program was not operating in the most efficient and cost-effective manner.

A 1976 Army Audit Agency (AAA) report on reimbursements for school bus drivers in Europe found that dominant servicing components were not uniformly computing the reimbursable costs of the student busing program and that the school system was not reimbursing the dominant servicing components for an estimated 49 percent of the overall student transportation costs in FY 1976. AAA also concluded that under-reimbursements for student transportation costs in prior years were equally substantial.

The GAO issued reports on the student busing program in 1974 and 1977. Both reports recommended that DOD develop cost-effective alternatives for transporting students.

In 1974, the GAO recommended that (1) a special task force be established to evaluate and report on opportunities for better transportation management, (2) routes and loading be periodically reassesssed, and (3) details on costs be incorporated into a management information system. DOD did not agree with the GAO recommendations and no systemwide action was taken on them at that time.

In 1977, the GAO stated once again that a program should be instituted to determine systemwide the most economical alternatives for transporting students and actions necessary to implement them. The GAO recommended that the Secretary of Defense direct ODS to initiate a program to identify alternative means of providing bus transportation that would reduce overall DoDDS operating costs.

The GAO itself suggested that ODS consider the increased use of part-time civilian employees to operate buses provided by the dominant servicing components as one alternative method of reducing transportation costs. Because school bus drivers are only required for limited periods during the 183-day school year, employing full-time drivers throughout the calendar year is both unnecessary and an inefficient use of funds.

The GAO also suggested that ODS consider the increased use of U.S. citizens living overseas to operate buses provided by the dominant servicing components. This action would reduce overall transportation costs primarily because, according to GAO estimates, about 20 percent of the U.S. citizens' income would be returned to the Government in tax revenues.

DOD agreed with the GAO recommendation that ODS initiate a program to identify more cost-effective means of providing bus transportation and indicated that efforts to effect economies in this area would be intensified. DOD also agreed that the use of part-time bus drivers would offer possibilities for reducing transportation costs, but that further evaluation was necessary before action could be taken.

A 1979 Defense Audit Service (DAS) report on the cost of busing DoDDS students in Europe suggested that the use of contract busing, instead of in-house busing, wherever feasible, would also reduce overall DOD transportation costs. DAS indicated that using commercial busing resources would (1) separate the dominant servicing components' transportation requirements from DoDDS requirements, and (2) stop the wasted expense of retaining school bus drivers during nonschool periods.

DAS found that full-time civilian employees who operate buses provided by the dominant servicing components spent an average of 35 percent of their annual time in an idle or non-productive capacity in FY 1979. DAS estimated that in Germany alone the FY 1979 cost of paying full-time civilian employees for idle or non-productive time was $4.7 million.

DAS recommended that OASD (MRA&L) require the military departments to:

- o Prepare comparative cost analyses of in-house and commercial contract school busing services.
- o Use the busing resources (in-house or commercial) or a combination of resources that provide the U.S. Government the most efficient and cost-effective means of transporting DoDDS students.

The Deputy Assistant Secretary of Defense for Program Management supported the DAS recommendations and in March 1980 the Deputy Assistant Secretary of Defense for Supply, Maintenance, and Transportation issued a directive requiring the military departments to prepare the cost analyses suggested by DAS. The directive requested that the Office of Management and Budget (OMB) cost comparison procedures be used to ensure consistency in methodology.

The military departments have not completed the comparative cost analysis of in-house and commercial school busing services and, until the results of the analysis are available, the most efficient and cost-effective means of transporting DoDDS students cannot be appropriately determined. Accordingly, the military departments should intensify their efforts to complete the cost analysis as soon as possible.

Transportation Allowances for Dormitory Students

Public Law 95-561, title XIV, section 1407(c) amends section 429 of title 37 of the United States Code to authorize transportation allowances for dependent students who attend DoDDS dormitory schools. Dependents who attend a 5-day-a-week dormitory school receive a transportation allowance for weekly trips to and from such a school during the school year. Dependents attending a 7-day-a-week dormitory school receive a transportation allowance for three trips to and from such a school during the school year.

DoDDS operates dormitory schools at several locations in Europe. Dependents who reside in locations within the Atlantic and European areas where there are no appropriate DoDDS facilities readily available generally attend a DoDDS dormitory school and receive a transportation allowance.

DoDDS does not operate dormitory schools in the Pacific region. Dependents who reside in an area within the Pacific region where there are no DoDDS schools reasonably available generally attend an approved non-DoDDS boarding school. DoDDS is clearly authorized to provide tuition reimbursement for these schools but transportation allowances for dependents attending such schools are not expressly provided for in title XIV.

The statute that authorizes dependents' transportation allowances specifically addresses transportation needs of students attending DoDDS dormitory schools. In contrast, transportation costs incurred by dependents attending approved non-DoDDS schools, where no DoDDS schools are available, are not expressly covered by this provision. Title XIV as administered by DOD has been construed, however, to provide sufficient general authority to provide reimbursement for transportation to non-DoDDS boarding schools. The following technical amendments to section 1407(b) of Public Law 95-561 and 37 U.S.C. 429 would clarify this situation:

- Section 1407(b) of Public Law 95-561 is amended by inserting immediately after the first sentence the following new sentence: "In such cases where the Secretary of Defense approves attendance under authority of this section, travel and transportation allowances shall be payable in accordance with section 429 of title 37 of the United States Code."
- Section 429 of title 37 of the United States Code is amended by inserting immediately after "to a school operated" in the first sentence the following: "or approved."

FACILITIES

ODS estimates that the FY 1982 reimbursable cost of maintenance and repair services, based on current ODS interservice support agreement data, will be $17.7 million and that 215 military department personnel, in addition to contract services personnel, will be required to provide these services. The maintenance and repair services category is the third most costly support service (after transportation and utilities) that is provided to DoDDS by the dominant servicing components under provisions specified in interservice support agreements.

Joint Army, Air Force, and Navy policy for the financial administration of support agreements stipulates that routine maintenance and cyclical repair performed on facilities to which the dominant servicing components (i.e., hosts) hold title is the financial responsibility of the host. In spite of this established policy, the dominant servicing components annually bill DoDDS for routine maintenance and cyclical repair work and DoDDS annually provides funds for these services.

The dominant servicing components budget for routine maintenance and cyclical repair work on their respective facilities, and it is their acknowledged responsibility to provide these services. Accordingly, the expenditure of DoDDS funds for maintenance and repair services should be limited to financing only those identifiable net additional costs arising from maintenance and repair that are considered to be beyond that prescribed by the regulations of the host, and that are performed at the request of the tenant. This action would cause a substantial reduction in DoDDS operating costs.

STUDENT FOOD SERVICES

Public Law 95-561, title XIV, section 1408 amends the National School Lunch Act and the Child Nutrition Act of 1966 to authorize DoDDS to participate in the USDA-sponsored school breakfast and lunch programs. There is, however, no mandatory requirement that all dependents schools offer the two programs.

Individual schools may choose to participate, while others do not, and schools may offer only a breakfast program or only a lunch program, at their discretion.

Except for DoDDS dormitory schools, there are currently no breakfast programs in dependents schools and apparently little interest in implementing them. There are lunch programs, however, in a number of schools throughout the DoDDS system that have appropriate cafeteria equipment and facilities.

The 1979 LMI study found that 28 percent of the schools (74 schools) in the DoDDS system had cafeteria equipment and facilities in place and were operating lunch programs. Another 14 percent of the schools (37 schools) had cafeteria equipment and facilities in place but were not operating lunch programs. The remaining 58 percent of the schools (152 schools) had no cafeteria equipment and facilities to operate lunch programs. The LMI study did not include data from the Panama Canal Zone schools that were subsequently included in the DoDDS system.

The LMI study estimated that the FY 1979 cost of equipment and facilities to establish meal preparation sites on a systemwide basis would be approximately $13 million and that an additional $1.3 million and 24 staff positions would be required to administer the program. The ODS Logistics Division estimates the FY 1982 cost of equipment and facilities at $22.4 million.

DoDDS has not received an appropriation to fund the cost of equipment and facilities that would be required in order to establish meal preparation sites on a systemwide basis. The DoDDS FY 1982 budget request contains $9.3 million for this initiative.

The majority of dependents schools operating lunch programs do not fully participate in the USDA-sponsored program. Less than 50 percent of the schools use USDA surplus agriculture commodities and less than 10 percent of the schools request USDA cash subsidies for meals served.

There is no clear indication that all dependents schools that do not have lunch programs actually desire or need them. A comprehensive needs analysis should be conducted before a decision is made to commit resources to establish these programs, and each local school and installation advisory committee should be consulted before making a firm decision to introduce the program in schools that do not currently participate.

RECOMMENDATIONS

1. DOD should require the military departments to expedite completion of the comparative cost analysis of in-house and commercial contract school busing services and then adopt the most efficient and cost-effective means of transporting dependent students.

   Audits conducted by the GAO and military department audit agencies have shown that there is a potential for substantial cost savings in transporting dependent students. Additional cost savings may also result from multi-use transportation arrangements, such as using school buses and routes to meet other dependents transportation needs.

2. DOD should also require the military departments to fund the costs of routine maintenance and cyclical repair performed by facilities used by DoDDS but to which the military departments hold title.

   Adherence to standard military department policies regarding routine maintenance and cyclical repair would eliminate potential duplication in budget requests for the same requirements.

3. The Department of Education should develop and maintain a complete inventory of current dependents schools interservice support agreements.

   The Education Department should work with the Defense Logistics Service Center to ensure that it maintains consistent support agreement data; conduct a comprehensive cost analysis of dependents schools interservice support agreements to identify actual costs and alternatives for reducing them; review interservice support agreements twice a year instead of every 2 years; and develop a methodology for allocating funds for logistical support services to the regions and schools on an equitable basis.

4. Local school and installation advisory committees should be consulted regarding implementation of school lunch programs.

   Before committing additional funds for school lunch programs, local school and installation advisory committees should review the potential costs and benefits of these programs in determining their relative priority with other school needs.

5. The Defense Logistics Agency (DLA) and the Defense General Supply Center (DGSC) should be requested to intensify their efforts to link DoDDS procurement procedures with the Standard Automatic Material Management System (SAMMS).

6. The Congress should amend Public Law 95-561, title XIV, section 1407(b) and 37 U.S.C. 429 to expressly authorize dependent students attending non-DoDDS boarding facilities to receive the same transportation allowances provided to dependent students attending DoDDS dormitory schools.

TRANSFER ARRANGEMENTS

It is proposed that, in order to effect the transfer of functions specified in section 302 of the Department of Education Organization Act (Public Law 96-88), a master servicing agreement be executed by the Department of Defense and the Department of Education. This interagency agreement would specify the Department of Defense as responsible for providing both reimbursable and nonreimbursable support services, including all support services specified in interservice support agreements, to the overseas dependents education system in manner and degree comparable to that provided up to the effective date of the proposed transfer of functions specified in section 302 of Public Law 96-88. The agreement would include a stipulation that DOD components would continue to hold title to DOD facilities used by the dependents schools.

This interagency agreement also would specify the Department of Education as responsible for funding all reimbursable logistical support services, including all reimbursable support services specified in interservice support agreements, that are provided to the overseas dependents education system by the Department of Defense. A draft of this interagency agreement is included in appendix O.

CHAPTER VI

ORGANIZATION AND MANAGEMENT

DESCRIPTION

BACKGROUND

The organizational history of the overseas dependents schools dates from 1946 when the military departments initiated an education system of elementary and secondary schools for dependents of military and civilian personnel serving overseas. The military departments continued to operate separate school systems until 1965, when a standardized school system was established.

In 1965, the overseas schools were placed under the policy control of the Assistant Secretary of Defense (Manpower and Reserve Affairs). This move created an organization for a unified school system. The overseas dependents school system was divided into three geographic regions: The European, managed by the Army; the Pacific, managed by the Air Force; and the Atlantic, managed by the Navy. Unity was not really achieved, however, according to the Defense Audit Service in a June 1978 report, entitled Review of the Department of Defense Dependents Schools Proposed Reorganization Plan: "... with each military Department having direct management responsibility for the schools in its geographic area, the system became fragmented, as each Department independently provided for its area's funding, manpower and most importantly, curriculum development."

In 1976, the Congress shifted operational responsibility for the dependents schools from the military departments to the Department of Defense. The Secretary of Defense established the Department of Defense Dependents Schools (DoDDS) as a single entity to operate the three-region overseas school system. The organizational structure that was in place at that time included a Washington headquarters office, three regional offices, and eight subordinate district offices.

On November 1, 1978, the Congress enacted the Defense Dependents' Education Act of 1978 (Public Law 95-561, title XIV). That act authorized the Secretary of Defense to establish and operate a Defense Dependents Education System. Section 1403 established an Office of Dependents Education within the Department of Defense:

> "Sec.1403.(a)(1) There is established within the Department of Defense an office to be known as the Office of Dependents' Education. (2) The Office of Dependents' Education shall be headed by a Director of Education (hereinafter in this title referred to as the "Director"), who shall be a civilian and who shall be selected by the Secretary of Defense and shall report to the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics.
>
> "(b) Except with respect to the authority to prescribe regulations, the Secretary of Defense may carry out his functions under this Act through the Director.

"(c) The Director shall—
(1) establish personnel policies, consistent with the Defense Department Overseas Teachers Pay and Personnel Practices Act, for employees in the defense dependents' education system,
(2) have authority to transfer professional employees in the defense dependents' education system from one position to another,
(3) prepare a unified budget for each fiscal year, which shall include necessary funds for construction and operation and maintenance of facilities, for the defense dependents' education system for inclusion in the Department of Defense budget for that year,
(4) have authority to establish, in accordance with section 1410, local school advisory committees.
(5) have authority to arrange for inservice and other training programs for employees in the defense dependents' education system, and
(6) perform such other functions as may be required or delegated by the Secretary of Defense or the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics.

"(d)(1) The Director shall establish appropriate regional or area offices for the Office of Dependents' Education in order to provide for thorough and efficient administration of the defense dependents' education system."

In 1978 the Secretary of Defense approved a reorganization plan that created the new structure for the overseas school system that is in existence today, with a Washington headquarters office and five regional offices. The district offices were eliminated, while the regional offices were enlarged and standardized to reflect the headquarters' organizational structure. Each office included a director's office, an education division, a personnel division, a logistics division, a financial management division, and an administrative services division.

The Panama Canal Treaty Act transferred responsibility for the former Panama Canal Company schools to DoDDS, where it became the sixth region.

PRESENT ORGANIZATION

DoDDS Headquarters

The headquarters of DoDDS is organized into the Office of the Director and five functional divisions--Personnel, Logistics, Fiscal, Education, and Executive Services. The description of the formal organization that follows is taken from DoDDS Directive 1310.1, "Organization and Functions," January 4, 1980.

The Education Division provides overall leadership for establishing a quality education program. It develops, implements, and evaluates the DoDDS educational programs. The Division develops policies and procedures related to curriculum and instruction, inservice training of educators, student services, evaluation, and accreditation. The Division implements those policies and procedures by (1) reviewing and selecting curriculum materials and processes, (2) developing materials and approaches in those programs that require unique adaptation, and (3) planning and providing inservice training for educators. Finally, the Division designs and conducts evaluation activities intended to analyze program effectiveness.

The Personnel Division develops policies, programs, and procedures with respect to the DoDDS personnel management system. The Division establishes goals and objectives for all personnel functions; provides guidance and advice to the regional personnel staffs on implementing policies and programs; monitors implementation of those policies and procedures to evaluate their effectiveness; and negotiates servicing agreements with the military services to obtain required personnel service and support for DoDDS worldwide.

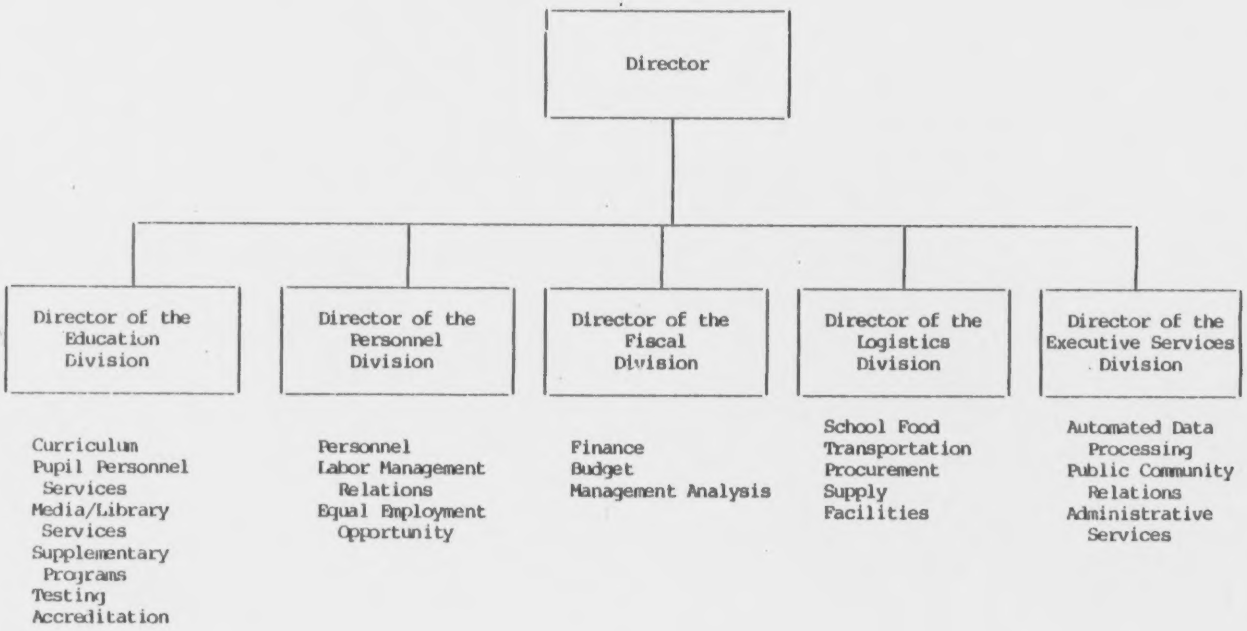
The Logistics Division establishes policies and procedures to provide effective supply support, develops long- and short-range construction programs for school facilities, operates a program to identify and repair building deficiencies, plans for participation in school food programs, and formulates policies and procedures for student transportation. The logistics function includes providing support services to the schools to ensure that procurement of textbooks, equipment, supplies, transportation, and repair and maintenance of buildings and equipment occur on a timely basis.

The Fiscal Division develops fiscal and budgeting guidance for the effective and efficient use of resources. The Division prepares and justifies the annual DoDDS budget, supervises the budget execution process, develops policies and procedures for DoDDS-wide accounting requirements, conducts management surveys and studies, and supervises the school tuition program.

The Executive Services Division manages the automatic data processing (ADP) function within DoDDS headquarters and the regions, operates a public/community relations program, manages student records, and provides all other required administrative support to the headquarters, including miscellaneous services such as mail support, forms management, and supply and office management.

Chart 3 shows the present organization of the headquarters office.

Chart 3. Present organizational structure of the overseas dependents schools headquarters


Director
Director of the Education Division
Director of the Personnel Division
Director of the Fiscal Division
Director of the Logistics Division
Director of the Executive Services Division
Curriculum
Pupil Personnel Services
Media/Library Services
Supplementary Programs
Testing
Accreditation
Personnel
Labor Management Relations
Equal Employment Opportunity
Finance
Budget
Management Analysis
School Food
Transportation
Procurement
Supply
Facilities
Automated Data Processing
Public Community Relations
Administrative Services

Regional Office

The regional structure is identical to that of the headquarters, with an Office of the Director and five functional divisions.

The Education Division helps to develop, implement, and evaluate the DoDDS educational programs. It participates in developing policies and procedures for curriculum and instruction, inservice training of educators, student services, evaluation, and accreditation.

The Personnel Division implements policies and procedures with respect to the DoDDS regional organizational structure, position classification, recruiting, pay, leave, grievance and appeals, equal employment opportunity, and labor relations.

The Logistics Division implements policies and procedures to provide effective supply support, develops construction plans, operates a program to identify and repair building deficiencies, plans participation in nutrition programs, and formulates policies and procedures for student transportation. The Division's functions include providing support services to the schools to ensure that procurement of textbooks, equipment, supplies, transportation, and repair and maintenance of buildings and equipment are handled on a timely basis.

The Fiscal Division provides budget and fiscal services needed to operate the programs within the region. It prepares the regional input for the total DoDDS budget, implements the regional budget, and monitors accounting data to ensure compliance with fiscal operating plans.

The Executive Services Division provides administrative support services to the regional operations, manages the ADP function, manages student records, and provides miscellaneous services such as mail support and forms management.

MANAGEMENT SYSTEMS AND PROCEDURES

As mentioned in other chapters of this transfer plan, DoDDS relies on the military departments and other DOD components for most administrative and management support. All accounting services and most personnel and logistical services are provided in this manner. Only in the budget, supply, and teacher recruitment areas does DoDDS carry out the majority of its own administrative functions.

This situation, plus the fact that a centralized system has existed only since 1976, probably accounts for the fact that there exists today only the most rudimentary form of management systems and procedures. The budget process and the Quarterly Management Report system are the only comprehensive management systems currently used by DoDDS.

The Budget Process

While the budget process can serve to focus attention on program and management goals and plans, the current DoDDS budget process is limited in that regard. As pointed out in other chapters, the current budget format is structured by standard object-class categories, making it difficult if not impossible to track programs. Secondly, the budget is not used as a comprehensive planning and programing tool at the school level. Principals have authority and responsibility only for a limited part of the total school budget. Prior to 1976, when the schools were operated as individual components of the military departments, there was little need for separate management systems, and even after ODS was created to provide central policy leadership the new coordinating procedures were not widely adopted. As the Defense Audit Service pointed out in its 1978 report: "...since each military department was sensitive only to the needs of its own schools, tri-service coordination was nearly impossible to achieve in order to develop a unified school system."

The Quarterly Management Report System

The Quarterly Management Report system is the only management reporting and control device that DoDDS uses. It is prepared by the regions and submitted to headquarters, where it is consolidated into a report that is used to justify budget estimates, evaluate operations, and aid in policymaking and in supervising the system's operations. This report consists of data in five areas:

- Distribution of school level personnel: Data are reported on school personnel by type of position (e.g., principal, classroom teacher, librarian) and by elementary and secondary level. They also include cost data and authorized strength levels.
- Distribution of above-school-level personnel: Data are reported on above-school-level personnel by type of position (e.g., regional office professional, clerical). They also include cost data and authorized strength levels.
- Summary of financial information: Appropriated fund costs are detailed in the areas of administration, education, logistics, and miscellaneous. Such line items as salaries, books, supplies, custodial services, maintenance, repairs, transportation, and rent are included. Funds are detailed by plan and actual expenditure.
- School membership: School enrollment data are recorded by grade, parent linkage (e.g., Army, Navy, Air Force), and tuition-paying or tuition-free status.
- Tuition-fee school and correspondence course information: Enrollment data are recorded for tuition-fee schools. They include cost data for the students enrolled in such schools.

While the Quarterly Management Report system would seem to provide an effective management tool, the report is not used to monitor progress in attaining program and management objectives. Because program and management objectives have not been clearly defined, they are not the basis for input to the system, which focuses almost exclusively on budget, fiscal, and personnel data to the exclusion of program data.

Data Processing

Most functions are now carried out with manual procedures and systems. This area was addressed in 1979 when DoDDS entered into a contract to study its automated data processing (ADP) requirements. The study concluded that the information requirements were significant enough to require computer support.

ANALYSIS

The 1978 reorganization of DoDDS was aimed at establishing a coherent, unified system. There is evidence to show that, despite considerable progress, the 1978 Defense Audit Service assessment is still true--that "one efficient, effective standardized worldwide system of dependents education does not exist." The following points may serve as illustration:

- Although the Five-Year Curriculum Development Plan may in fact be producing a quality curriculum for the schools, the degree of implementation of that plan varies greatly among the regions and schools. The tie between curriculum planning and implementation (with personnel, materials, and facilities) is almost nonexistent. There is no installation planning and monitoring mechanism or unit to ensure and facilitate compliance with the plan once it has been developed. As a result, the degree of compliance with the plan varies among regions and schools.

- The planning and monitoring systems are not sufficient to deal with the complexities of an organization as large as DoDDS. There is no central policy unit or mechanism (other than the budget process) that can deal with the total aspects of program planning or implementation. The program planning that does exist is curriculum specific. The 5-year process sets goals and objectives and is effective at establishing systemwide and school-level plans. It does not, however, deal with the personnel, material, and facilities necessary to implement that curriculum plan. There are no mechanisms to tie all these important factors together into an operating plan.

- The organizational structure and staffing differ among regions. The Pacific region has small district staffs, consisting of an educational program administrator, a business manager, and clerical support staff, while Germany North and Germany South, each of which is considerably larger than any other region, do not have an organization unit or staff between their regional office and their schools. As a result, the principals in the Germany regions have more responsibility placed on them than in other regions. Additionally, the regional offices in Germany have to deal with a far larger number of schools than do the other regions.

- Although greater responsibility has devolved on the school principals (particularly in the former European region), there has not been a systematic approach to preparing them for the enhanced role. Conversely, there is also no mechanism for establishing goals and objectives for the principals and measuring their performance against them. Both support and accountability are weak at this key management point in the school system.

- The automated data processing capability that existed in the European region at the time of the 1978 reorganization could have been more effectively retained and used throughout the system. Instead, many of the systems are no longer effectively maintained.

- While the Quarterly Management Report is the only systemwide management mechanism in DoDDS, it has two major weaknesses: It does not focus on management plans or objectives, and it does not provide systematic feedback from headquarters to the regions on the report data.

ROLE CLARIFICATION

Although the description earlier in this chapter of the functions of the headquarters and regional offices may have given the impression of clear distinctions between those levels, there is in fact some confusion over the roles and authorities of the various levels in the current system. In some areas such as personnel management, the authorities are well defined. In other areas, however, such as curriculum coordination, there is less certainty about the role to be played at each level. Changes and improvements in the current organization and management of the overseas school system need to start with a clarification of the roles and responsibilities of the headquarters, regional offices, and subordinate levels.

Efforts should be taken to sharply define the role of the headquarters office as mainly policy and general management direction. The role of the regional offices should be more clearly defined as operational, in day-to-day control of the school activities in that region. Wherever possible, operational functions that have been carried out at headquarters should be reviewed to see if they could be carried out better at the regional level.

PROGRAM PLANNING

To increase the effectiveness of the headquarters organization in creating a unified system, several changes should be implemented. First, a strong program planning function needs to be established. Program in this context is defined as the combination of curriculum, staff, materials, and facilities. These four elements are necessary to produce a comprehensive educational program. As mentioned previously in this chapter and described in detail in chapter II, a systematic curriculum-specific planning function is in operation, but there is no general program planning function, system, or unit that deals systematically across the board with program issues. Such a unit should be created and charged with the following functions:

- Defining program goals and objectives for the system.
- Establishing program measures to assess the progress of programs in meeting these objectives.
- Recommending the allocation of resources to programs.
- Synthesizing all aspects of DoDDS operations as they relate to program operations.
- Monitoring program plans.

PROGRAM EVALUATION

The program evaluation function should be strengthened. As in program planning, there is no systematic evaluation of the broad aspects of the DoDDS program. The Five-Year Curriculum Development Plan evaluates specific curriculum issues, and some other specific evaluation activities occur with some regularity. However, the size, geographic dispersion of the system, and concern about quality are all persuasive reasons for having a strong program evaluation function that will provide a regular and systematic assessment of the overall DoDDS program as well as its specific programs. Additionally, because DoDDS students move frequently between the overseas schools and stateside schools, this evaluation function is needed so that DoDDS can regularly measure itself against comparable school systems in the United States.

MANAGEMENT PLANNING AND MONITORING

A management planning and monitoring system needs to be established. As in the program planning area, there is no current mechanism to establish management plans, goals, and objectives, or to track their implementation and assess their impact. Each functional area, such as logistics or personnel, has this responsibility for its own area, but there is no mechanism for integrating various functions or plans that interrelate. For example, school transportation costs are the largest single item of DoDDS expenditure after salaries and have been growing rapidly. Such a management planning function would provide a mechanism to analyze the total issue--direct costs, implications for an equipment budget, personnel impact, school boundary issues, and any other related issues. Finally, if a goal were established to reduce costs or implement alternative transportation systems, there is no system or mechanism to communicate headquarters' plans to the regions and monitor regional performance.

A management planning and monitoring system would complement a program planning system to establish goals, determine performance standards, and monitor the system and would provide a basis for better budget planning, manpower allocation, and assessment of the total DoDDS operation.

COMMUNICATION

The preceding suggestions serve to support the need to establish a more effective communication system. Newsletters, directives, conferences, meetings, and other devices are now being used to communicate within the system, but, as in many other organizations in the Federal Government, a more effective job is needed to ensure an adequate flow of information. In an organization like DoDDS--geographically scattered and rather large--misinformation, conflicting directives, and divergent interpretations of information spread easily and rapidly and often lead to misunderstandings, inefficiency, and confusion. Improved communication will automatically result from installing program and management planning and reporting systems. Objectives will tend to be more clearly stated, annual operating plans will be established and communicated to all levels, and information will be directed regularly both upward and downward in the system.

These formal work-oriented tools are only half of the communication issue. The other equally important half is the more informal house-organ or newsletter approach. All employees need to have available to them a regular and reliable source of information. With a worldwide work force concerned with such important issues as salary adjustments, cost of living allowances, housing allowances, education benefits, leave regulations, and job opportunities, the system cannot rely on haphazard, sporadic dissemination of information. The information going to employees must be regular, frequent, comprehensive, accurate, and useful. Employees should receive such information on these and related issues from their employer first.

DATA SYSTEMS

The previously discussed systems--of program planning and evaluation, management planning and monitoring, and communication--depend upon access to comprehensive data in usable form. DoDDS does not have such a data system. First, although data are adequate in some areas, there remain important gaps. For instance, meaningful data on student characteristics and achievement are a critical missing element for the DoDDS school system. (See chapter II for further discussion of this issue.) Secondly, the information that is available is not readily usable. For example, as mentioned in chapter IV, DoDDS relies entirely on the military departments for financial services. Because of multiple, non-standardized fiscal systems, DoDDS does not have appropriate financial data available to it on a timely basis in a usable form. Finally, there is information such as personnel data that is available but because of its quantity is almost impossible to deal with efficiently at present.

All these factors point to the desirability of developing effective information systems supported by automated data processing. DoDDS recognized that a centralized policymaking role requires systematic procedures for collecting and processing data when it commissioned the 1979 feasibility study "to provide ADP systems analysis design and development support to the Department of Defense Dependents Schools." A thorough analysis was completed of (1) the requirements for a DoDDS headquarters management information system, regional management information systems, school administration, computer education, and ADP management, and (2) the existing procedures, systems, and functions of each division at headquarters and the regional offices.

The general conclusions were that the information requirements of headquarters, region, and school administrators were significant enough to require computer support. Secondly, it was concluded that the geographic dispersion of DoDDS did not preclude standardizing computer support nor prohibit developing a systemwide management information system. The study also concluded that existing Government facilities did not meet the DoDDS requirements. The study recommended the development of headquarters and regional management information systems and defined 155 specific computer applications.

Finally, the study reviewed various hardware alternatives, including commercial time-sharing, in-house minicomputers, and military department computer facilities, and concluded that the in-house minicomputer would be the best hardware alternative for DoDDS.

In addition to producing what was a rather standard feasibility study of management information requirements, this study reviewed the computer education ADP requirements for the DoDDS schools. The DoDDS computer education program (discussed more fully in chapter II) consists of instruction in the uses of computers and the application of computer technology in the classroom. Therefore, the DoDDS ADP requirement is two-fold--traditional management applications and computer education. The complexities presented by this situation were recognized when the study concluded that "the critical final task in the overall feasibility analysis will be to integrate the findings and recommendations presented for computer education with those associated with school administration requirements." The study recommended installation of small and mid-sized computers to support the computer education program.

The feasibility study and subsequent work produced a thorough basis for an ADP program and management information system for DoDDS. The study identified systems and groups of applications that justified ADP support, and DoDDS selected applications for immediate automation. The current status of this effort should be reviewed to determine whether the applications with the most contribution to the system are being addressed. What is important to the long-range development of systems in ODS is that the units and key individuals in the organization agree on the approaches to be followed.

Secondly, the issue of hardware acquisition should be decided quickly so that all three involved levels--headquarters, regions, and schools, can move immediately on the equipment acquisition process. This is especially important at the school level where some equipment already exists and decisions are required on retention, modification, or replacement of existing equipment. It is therefore recommended that a systems development board be created to oversee and coordinate ADP systems development and implementation in DoDDS.

ORGANIZATIONAL STRUCTURE

The suggestions contained in this chapter are reflected in the proposed organization of the overseas dependents schools headquarters shown in chart 4. This organizational design is based on the following principles:

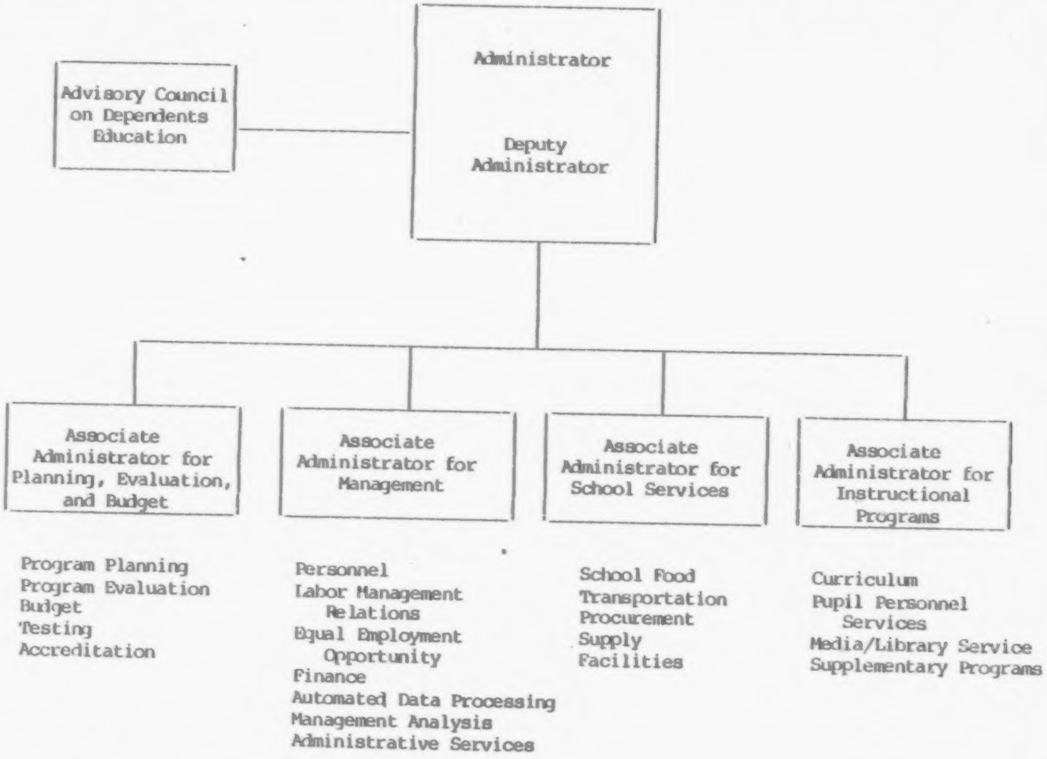
- A strong program planning function is required.
- A strong program evaluation function is required.
- Both planning and evaluation should be directly tied to the budget process so that financial planning more closely reflects priorities and program goals.
- The direct school services of procurement, supply, facilities, student transportation, and school food should be in one unit to provide central leadership and direction to complement the instructional program.
- Related functions should be grouped to encourage greater coordination.

The proposal gives greater organizational emphasis to general program planning and evaluation. Curricular-specific planning and evaluation would still be carried out in the instructional programs unit, but a new unit for planning, evaluation, and budget would be responsible for developing and monitoring systemwide programs. For example, this new unit would have been charged with the task of developing a systemwide plan to implement Public Law 94-142. It could have coordinated the new planning process that would have produced a comprehensive plan including curriculum, personnel, facilities, and supply--the total range of elements necessary to implement the law.

The general management functions of personnel, finance, management planning and analysis, administrative services, and automated data processing are combined in a second office. These functions are general systemwide support activities.

The third major unit is also made up of general systemwide functions but they are more school unique in that they service much more directly the actual operation of the individual schools.

Chart 4. Proposed organizational structure of the overseas dependents schools headquarters


Advisory Council on Dependents Education
Administrator
Deputy Administrator
Associate Administrator for Planning, Evaluation, and Budget
Associate Administrator for Management
Associate Administrator for School Services
Associate Administrator for Instructional Programs
Program Planning
Program Evaluation
Budget
Testing
Accreditation
Personnel
Labor Management Relations
Equal Employment Opportunity
Finance
Automated Data Processing
Management Analysis
Administrative Services
School Food
Transportation
Procurement
Supply
Facilities
Curriculum
Pupil Personnel Services
Media/Library Service
Supplementary Programs

These functions of school food, student transportation, procurement, supply, and facilities are vital to the day-to-day operation of the schools.

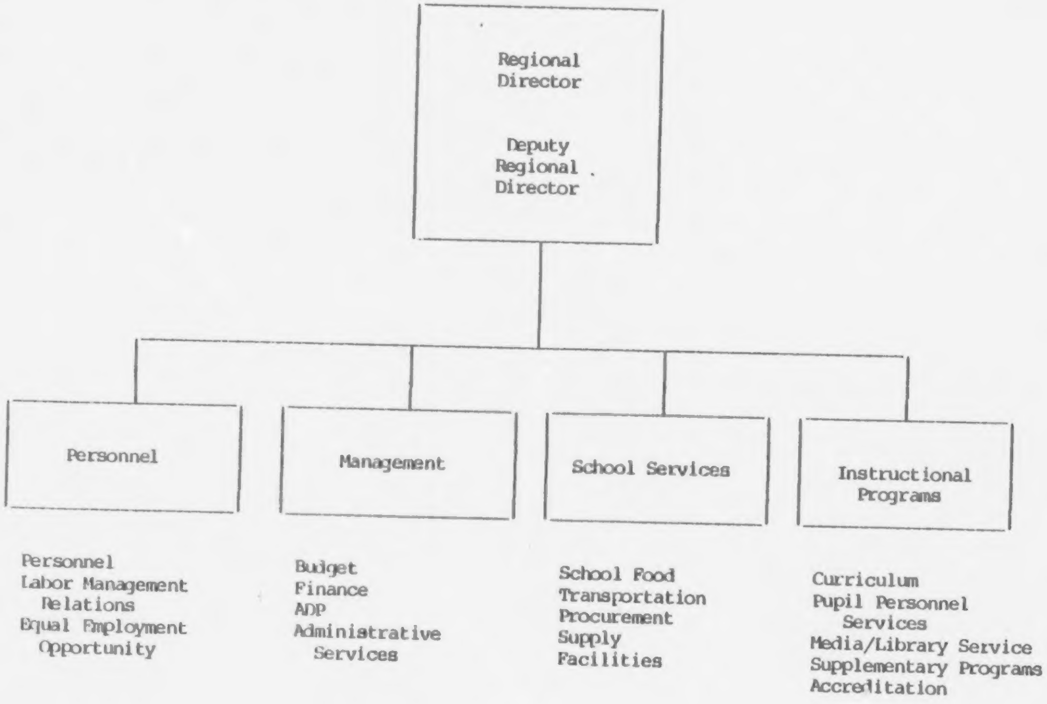
The last unit is responsible for the instructional programs of the schools. This covers both general and special educational programs and includes curriculum and the areas of media/library and supporting personnel services such as guidance and counseling.

This organizational design adds one new unit to the existing organization and reduces the total number of major units reporting to the Administrator from five to four. It is believed that this proposal would facilitate stronger headquarters leadership, better planning, and closer integration of operations.

It is further recommended that the Administrator, Deputy Administrator, Associate Administrators, and Regional Directors be constituted as a management group for the system. This group of the top executives should meet regularly to develop operating policies and plans, monitor implementation of specific objectives, and evaluate progress toward these objectives and the overall status of the system.

There are good arguments both for and against the principle that the regional office organization should be identical to the headquarters organization. Direct linkages between identical organizations would facilitate communications and operating procedures. However, with headquarters emphasis on planning, policy, evaluation, and oversight and a regional office emphasis on operations, there is in fact strong reason why the two organizations should be different. In the regional program, planning and evaluation functions are less important than at headquarters. Because of the central headquarters responsibility for policy, planning, and evaluation, the regional exercise of these functions would be secondary. Chart 5 shows the proposed organizational structure for regional offices.

Chart 5. Proposed organizational structure of the overseas dependents schools regional offices


Regional Director
Deputy Regional Director
Personnel
Management
School Services
Instructional Programs
Personnel
Labor Management Relations
Equal Employment Opportunity
Budget
Finance
ADP
Administrative Services
School Food
Transportation
Procurement
Supply
Facilities
Curriculum
Pupil Personnel Services
Media/Library Service
Supplementary Programs
Accreditation

RECOMMENDATIONS

1. The roles and responsibilities of the headquarters, regional offices, and subordinate administrative levels should be redefined.

   The role of the headquarters office should be redefined as mainly policy and general management direction. The role and authority of the regional offices should be strengthened as the operational units in control of day-to-day activities in that region.

2. A program planning and monitoring unit should be created in headquarters.

   This unit would be responsible for integrating curriculum, staff, material, and facilities requirements into a comprehensive educational program. Specifically, the unit would define program goals and objectives, establish measures to assess program progress, recommend resource allocations, and monitor program plans.

3. A management planning and reporting system should be developed to establish management goals and objectives, track their implementation at the regional and school level, and assess the adequacy of achievement.

   This system would complement a program planning system and provide a basis for better budget and manpower planning and allocation and for assessment of the total overseas schools operation.

4. The development of an automated data processing system should be expedited to meet basic management requirements.

   A thorough automated data processing (ADP) feasibility study has been completed by DoDDS. The study recommendations should be reviewed against the findings and recommendations of this transfer plan to assure that key problem areas and needs are being addressed. It is also recommended that a systems development board with headquarters and field representation be established to oversee and coordinate ADP systems development and implementation in the overseas school system.

5. The evaluation function should be strengthened to ensure a regular, systematic assessment of major educational programs and to compare the results of that assessment periodically against an appropriate reference group of excellent school systems in the United States.

In addition to ongoing accreditation activities, more attention should be given to keeping abreast of program and management improvements being made in the best U.S. public school systems.

6. A more effective communications system should be established, not only by installing program and management planning and monitoring systems (recommendations 2 and 3) but also by publishing and distributing a regular, frequent, comprehensive, authoritative, and accurate newsletter on important issues.

7. The headquarters office organization should be redesigned as shown in chart 4, and regular meetings should be held of the Administrator, Deputy Administrator, Associate Administrators, and Regional Directors to serve as a management group for planning, implementing, and evaluating the overall administration of the overseas school system.

CHAPTER VII

THE PANAMA CANAL COLLEGE

DESCRIPTION

The Panama Canal Zone Junior College was established in 1933 and operated by the Canal Zone Government to provide postsecondary educational opportunities for Canal Zone employees and their dependents. The college offers associate degree programs in accounting, business, data processing, medical technology, and other career-related fields. Special programs such as English-as-a-second-language are also offered, and several cooperative programs with Panamanian educational and training institutions have been initiated in recent years.

In 1980, enrollment totaled about 1,400 students, of whom 30 percent were full-time. The full-time student body of 411 consisted of individuals sponsored by the Panama Canal Commission (46%), dependents of military personnel (35%), and others (19%). The college employs 32 full-time teaching and administrative staff with civil service status, 60 part-time contract teachers, and 87 support personnel. In FY 1980, college operating expenses totaled about $1.8 million, of which $952,000 was covered by tuition charges to individual students and/or agency payments for sponsored students, and $848,000 was provided as a direct subsidy by DOD.

ANALYSIS

In 1979, responsibility for operating the college was assigned to the Department of Defense. Section 1321(g) of the Panama Canal Treaty Act, Public Law 96-70 states:

> "Notwithstanding any other provision of law, the President, through the appropriate department or agency of the United States, shall, until January 1, 2000, operate the educational institution known as the "Canal Zone College." Such institution shall continue to provide, insofar as practicable, the level of services which it offered immediately before the effective date of this Act."

The Conference report noted that the requirement to continue the same level of services of the college includes a continuation of present tuition policies.

The President delegated responsibility for operating the college to the Secretary of Defense under Executive Order 12,173 (Nov. 29, 1979). This responsibility was, in turn, redelegated to the Director of DoDDS, since the elementary and secondary schools operated in the former Panama Canal Zone were also reassigned to DoDDS. A college charter was approved by DOD in April 1980, and its board of trustees is now appointed by and responsible to the Director of the Panama region.

In late 1979, shortly after passage of the Panama Canal Treaty Act, the Department of Education Organization Act, Public Law 96-88, was enacted. While section 302 of that act provides that functions relating to operation of the overseas schools should be transferred from the Department of Defense to the Department of Education, subsection (d) states: "Nothing in this Act shall be construed to give the Secretary authority to operate overseas institutions of higher education."

The Conference Committee report (No. 96-459, 1st session, p. 49) stated that it was the intention of the conferees that "nothing in this Act will be construed to grant authority for the Department of Education to operate the Panama Canal Zone College, and if operation of this institution or any other overseas institution of higher education is authorized in any other provision of law, such other provision of law shall be applicable."

It is not entirely clear whether the Congress intended to effect a transfer of the functions of the Secretary of Defense regarding the Panama Canal College to the Secretary of Education. The basic authority for operation of the college derives from section 1321(g) of the Panama Canal Treaty Act and Executive Order 12,173 rather than the Department of Education Organization Act.

In developing this transfer plan, Department of Education staff visited the Panama Canal College and discussed its future status with representatives of the college faculty, parents, and students, the U.S. Southern Command, and the Panama Canal Commission. Most of these representatives felt that the college is meeting an important educational need, contributes to maintaining the quality of life for employees involved in operating the Panama Canal, and should be continued as a community-oriented, locally controlled institution in keeping with its tradition of almost 50 years. Retaining the current status of the college was regarded as an important factor in maintaining the morale of the local community and in the success of the transfer arrangements under the Panama Canal Treaty Act.

Other U.S. educational institutions also offer college and graduate programs in the Panama Canal community. In reviewing the FY 1980 DOD appropriation request, the House Appropriations Committee recommended that DOD cease direct financing of the college after the 1980-81 school year and support it in a manner similar to the way in which it supports U.S. forces in other parts of the world. The Committee report stated:

> "There are excellent universities in this country that already conduct courses of study overseas for DOD military and civilian employees. Therefore, the Committee believes the operation of the Canal Zone College should be administered by a leading university as are other DOD overseas college-level training programs."

Based on an analysis of the legislative provisions pertaining to the Panama Canal College and the views of individuals and organizations most familiar with its operations, several alternatives were considered regarding the future status of the college after transfer of the overseas dependents schools to ED:

- Transfer the college to ED and maintain it as an adjunct to the overseas dependents school system.

  This alternative would retain the existing relationship of the college as a component of the overseas school system in Panama and assure minimal disruption in completing the transfer. The Board of Trustees would serve as the policymaking body responsible for operating the college and continue to operate it as a community-oriented, locally controlled institution.

- Transfer the college to ED and seek legislation to establish the college as a special institution.

  The second alternative would treat the Panama Canal College as a special institution assisted by the Federal Government but operated as an independent higher education institution. This alternative would be similar to existing arrangements for Gallaudet College and Howard University. Legislative provisions might include a savings clause to protect the civil service status and salary rates of current employees of the college, and a gradual phase-out of Federal support through January 1, 2000, when the college would become totally independent and cease to be treated as a special institution.

- Transfer the college to ED and contract with a U.S. institution of higher education to operate the college.

  The third alternative would remove the Department of Education from a direct operating role but would assure that the services currently provided by the college are maintained through January 1, 2000. Reliance on a U.S. higher education institution to operate the college, as is now done in the case of the National Technical Institute for the Deaf, would provide a basis for expanding course offerings and further strengthening the college but would reduce local control and modify the status of the college as a community-oriented educational institution.

- Continue to assign responsibility for the college to the Secretary of Defense.

  This last alternative would require redelegating responsibility for oversight and financial support of the college to another organizational component of DOD. Although DOD's principal mission is not education, it does administer extensive educational programs for its military and civilian personnel in the United States and abroad and has substantial ongoing relationships with U.S. higher education institutions.

RECOMMENDATION

Section 302(d) of Public Law 96-88 states clearly that the Secretary of Education is not authorized to operate overseas institutions of higher education. More importantly, section 102 of the act defines the purpose of the Department of Education as supplementing and complementing the efforts of States, local school systems, public and private educational institutions, and others in improving the quality of education. Since the legislative history is unclear regarding the precise intent of the Congress regarding the transfer of the Panama Canal College, and the purposes of the Department call for a supportive rather than an operating role in relationships with public and private educational institutions, the following recommendation is offered:

- Responsibility for the Panama Canal College should remain with the Department of Defense, pursuant to Public Law 96-70, section 1321(g), as the preferred course of action.

APPENDIXES

APPENDIX A. CHARTER OF THE ADVISORY COUNCIL ON DEPENDENTS EDUCATION

1. Authority

   a. The Defense Dependents' Education Act of 1978 (Section 1411, Title XIV, Pub. L. 95-561; 20 U.S.C. 929), enacted November 1, 1978, as amended by the Department of Education Organization Act (Section 508 (j) Pub. L. 96-88; 20 U.S.C. 929) enacted October 17, 1979, and effective May 4, 1980, authorizes the Advisory Council on Dependents' Education.

   b. The Federal Advisory Committee Act (Pub. L. 92-463; 5 U.S.C. Appendix I), sets forth standards for the formation and use of advisory committee.

2. Official designation

   Advisory Council on Dependents' Education.

3. Objectives and Scope:

   The Council advises the Secretary of Education and the Director of Dependents' Education on improvements to achieve and maintain a high quality public education program through secondary school for minor dependents in overseas areas as defined in section 1414, Pub. L. 95-561, as amended.

4. Time required to carry out the purpose of the Council:

   See paragraph 11 below.

5. Official to whom the Council reports:

   The Council reports to the Secretary of Education and the Director of Dependents' Education, Department of Defense.

6. Agency responsible for providing support services:

   The Department of Defense provides support services to the Council.

7. Functions of the Council:

   The Council:

   a. Recommends to the Director general policies for operation of the defense dependents' education system with respect to curriculum selection, administration, and operation of the system. This requires communication with regional and local levels of the system, including school advisory committees, with respect to matters concerning the operation of the schools.

b. Makes recommendations to the Director and the Secretary of Education on the orderly transfer of the functions under the Defense Dependents' Education Act of 1978 to the Secretary and Department of Education.

c. Provides information to the Director from other Federal agencies concerned with primary and secondary education with respect to education programs and practices which such agencies have found to be effective and which should be considered for inclusion in the defense dependents' education system.

d. Advises the Director on the design of the study and the selection of the contractor referred to in section 1412 (a) (2) of Title XIV of Pub. L. 95-561, as amended, and

e. Performs such other tasks as may be required by the Secretary of Education.

8. Structure

The council is composed of the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics and the Administrator of Education for Overseas Dependents who are the co-chairs and twelve individuals appointed by the Secretary of Education who shall be individuals who have demonstrated an interest in the fields of primary or secondary education and who shall include representatives of professional employee organizations, school administrators, parents of dependents enrolled in the dependents' education system, and one student enrolled in such system; and a representative of the Secretary of Education and of the Secretary of Defense.

The Director of Dependents' Education shall be Executive Secretary of the Council.

The term of office of each member of the Council appointed shall be three years, except that

(1) of the members first appointed, four shall serve for a term of one year, four shall serve for a term of two years, and four shall serve for a term of three years, as determined by the Secretary of Education at the time of their appointment, and

(2) any member appointed to fill a vacancy occurring before the expiration of the term for which his predecessor was appointed shall be appointed for the remainder of such term.

9. Estimated annual operating cost:

The estimated annual operating cost for the Council is $135,896, the direct cost for operating this Council, including compensation and travel for members but excluding staff support. Staff support is provided by the Office of Education for Overseas Dependents.

10. Number and frequency of meetings:

The Council meets at least once per quarter for a minimum of four meetings each calendar year.

11. Termination date:

Section 1411(e) of the Defense Dependents' Education Act of 1978 provides that the Council continues in existence until terminated by law. The charter will terminate two years from the date of signature.

12. Date Charter is filed:

APPROVED

OCT 29 1980
Date

Shirley Hufstedler
Secretary of Education

DEC 15 1980
Date

Harold Brown
Secretary of Defense

APPENDIX B. DOD INSTRUCTION CONCERNING LOCAL EDUCATIONAL ADVISORY COMMITTEES (No. 5105.49) and GUIDELINES FOR ESTABLISHMENT AND OPERATION OF LOCAL ADVISORY COMMITTEES

January 2, 1981
NUMBER 5105.49

Department of Defense Instruction

ASD(MRA&L)

SUBJECT: Local Educational Advisory Committees

References:
(a) Public Law 95-561, "Defense Dependents' Education Act of 1978," as amended
(b) DoD Directive 1342.6, "Department of Defense Dependents Schools (DoDDS)," October 17, 1978
(c) DoD Directive 5124.1, "Assistant Secretary of Defense (Manpower, Reserve Affairs, and Logistics)," April 20, 1977

A. PURPOSE

To establish advisory committees at the local school and military installation levels, under references (a) and (b).

B. APPLICABILITY

The provisions of this Instruction apply to the Office of the Secretary of Defense, the Military Departments, the Organization of the Joint Chiefs of Staff, the Commanders of the Unified and Specified Commands, and to employees of the DoD dependents' educational system (referred to as "DoD Components").

C. DEFINITIONS

1. Parent. Includes father, mother, legal guardian, or person standing in loco parentis whose employment, military status, or payment of tuition creates enrollment eligibility for dependents in the DoD Dependent Schools.

2. Area or School Community. Refers to parents of students enrolled in the school, school employees, and students.

3. Military Installation. A local geographical area, under the jurisdiction of a military commander, where one or more dependents' schools are located.

4. Voting Age. 18 years and over.

5. Professional School Employee. Anyone employed by the DoD dependents' educational system as a professional educator.

D. POLICY

1. The establishment of local advisory committees, in accordance with P.L. 95-561, as amended, and DoD Directives 1342.6 and 5124.1 (references (a), (b), and (c)), fosters the concept of participation in school affairs by members of the school community. It is the policy of the Department of Defense to encourage professional employee and family participation in the formation and operation of overseas local advisory committees, to promote the vitality of these committees, and to preserve their integrity and independence of action.

2. Toward implementing this general policy, each school shall establish and operate a school advisory committee, with membership elected from among parents of students, professional school employees, and students to advise the principal on school matters (see D.4. and enclosure 1).

3. When only one school is located on a military installation, the school advisory committee shall also serve as the installation advisory committee. In these cases, the school advisory committee shall advise both the school principal and the installation commander.

4. When the military installation or overseas area has more than one school, an installation advisory committee shall be established.

E. RESPONSIBILITIES

1. Chairs of Local Advisory Committees shall:

a. Deal with issues brought to their attention by the school community.

b. Advise the school principal or the installation commander on school matters, as specified in enclosure 1.

c. Communicate with the Advisory Council on Dependent Education on significant educational matters, using the guidelines in enclosure 1.

2. Regional Directors shall:

a. Provide administrative assistance to local school principals in support of the operation of school advisory committees and as specified in enclosure 1.

b. Respond to advisory committee issues brought to their attention by a principal or by an advisory committee.

c. Act as a two-way communications link between the local and national levels on advisory matters related to dependents' education.

3. School Principals shall:

a. Provide logistic and administrative support to the school advisory committee.

b. Form the planning committee for school advisory committee elections during the school year 1980-1981.

c. Communicate with the regional director on advisory matters that cannot be resolved at the local level.

4. Installation Commanders shall:

a. Provide logistic and administrative support to the installation advisory committee.

b. Act as a communication link between the installation advisory committee and the military chain of command on school advisory matters of interest and concern to the Military Departments.

5. Heads of DoD Components shall ensure that this Instruction is complied with in their areas of responsibility.

F. INFORMATION REQUIREMENTS

DoD Components shall follow the review, communication procedures, and reporting requirements in enclosure 1.

G. EFFECTIVE DATE

This Instruction is effective immediately.

R Danzig
Richard Danzig
Principal Deputy Assistant Secretary of Defense
Manpower, Reserve Affairs, and Logistics

Enclosure - 1
DoD Overseas Dependents' Schools
Guidelines for the Establishment
and Operations of Local Advisory
Committees

DOD OVERSEAS DEPENDENTS' SCHOOLS
GUIDELINES FOR ESTABLISHMENT AND OPERATION OF LOCAL ADVISORY COMMITTEES

A. FORMATION OF COMMITTEES

1. Election of the School Advisory Committee

a. General Rules. The tasks to be completed in conducting elections for school advisory committees shall include the following:

(1) Publishing an announcement of the formation of a planning committee to nominate candidates for election to the school advisory committee and of the eligibility criteria 1 week in advance of the committee's formation.

(2) Publishing an announcement that includes the election date, hours, locations, names of candidates, and voter eligibility 2 weeks before the elections.

(3) Having the planning committee conduct the election, tabulate the votes, and certify the results.

(4) Publishing an announcement of election results as soon as possible after the election.

b. Planning Committee. Each year the elected chair of the school advisory committee shall form and appoint a chair for a planning committee to conduct elections for the school advisory committee. (The school principal shall form a planning committee for the 1980-81 school year and for any newly created school. That committee selects a planning committee chair.) The planning committee shall consist of parents of students enrolled in the school, professional employees from the school, the commander (or designee) of the military installation on which the school is located, a union representative, and students enrolled in the school. Planning committee responsibilities shall include:

(1) Soliciting candidates who are eligible and willing to serve on the school advisory committee.

(2) Ensuring that all eligible and willing candidates are placed on the ballot, including providing for write-in candidates on the ballot.

(3) Making necessary local arrangements for conducting the election.

(4) Tabulating, certifying, and announcing the results of the election. Unless impossible to avoid, members of the existing school advisory committee (except for the chair) may not be selected for membership on the planning committee. The responsibilities of the planning committee shall be carried out under the guidelines prescribed here and completed by October 15.

c. Nomination of Candidates. To qualify as a candidate for election to the school advisory committee, a person must be able to maintain membership for the whole term and must be:

(1) A parent of a student enrolled in the school.

(2) A professional school employee, such as, education program manager, assistant principal, teacher, pupil personnel specialist, librarian, media specialist, or nurse; but not the principal.

(3) When appropriate, a student enrolled in the school. The determination as to whether student membership on the advisory committee is appropriate and the selection procedures for student candidates shall be decided by the planning committee. Planning committees may adopt a process whereby a student could be placed on the ballot as a result of having won an election held among students in the school.

d. Number of Candidates. The number of candidates on a ballot should be at least double the number of authorized members.

e. Voter Qualifications. To vote in a school advisory committee election, a person must be of voting age and:

(1) A parent of a student enrolled in the school.

(2) A professional school employee.

(3) A student in the school.

f. Voting Procedures

(1) Voting shall be by secret ballot.

(2) One ballot shall be constructed, consisting of the candidates' name arranged alphabetically under one of three categories: "parents," "professional school employee," or "student."

(3) A voter may vote for as many candidates in a category as are authorized for membership on the school advisory committee.

(4) A voter may cast less than the maximum number of votes authorized; however, any vote cast shall be weighted as one vote.

(5) Any ballot containing votes in excess of the maximum number authorized shall be invalidated as to the category in which the excess votes were cast. Voters shall be advised of this consequence before they vote.

(6) An election shall be decided by plurality vote. In the case of a tie, the candidates, under the supervision of the planning committee, shall be determined by the flip of a coin.

(7) Candidates who receive an insufficient number of votes to be elected shall be designated alternate committee members. Such members shall be ranked by category according to the number of votes received and appointed, in that order, by the chair to fill the unexpired term of a vacancy in the appropriate category.

g. Election Date. Elections shall be conducted at the beginning of each school year and completed by October 15. Newly elected officers shall take office on the first Monday in November.

h. Tenure of Members. Elected members shall serve for 1 year. Members normally may not serve more than three consecutive terms.

2. Election to the Installation Advisory Committee

a. One School Per Installation. When only one school is operated on a military installation, members of the school advisory committee shall also make up the membership of the installation advisory committee. Therefore, election to the school advisory committee constitutes election to the installation advisory committee.

b. Two Schools or More Per Installation. When two or more schools are operated on a military installation, the installation advisory committee shall be composed of two representatives from each of the school advisory committees and a student representative. The two committee representatives shall consist of the parent and the professional school employee who receive the highest number of votes in the school advisory committee election. When a vacancy occurs on the installation advisory committee, membership shall pass to the person with the next highest number of votes in that category.

3. Composition of the School Advisory Commitee

a. Committee Size

(1) The size of elected membership shall be in accordance with the school population, as shown below, and contain an equal number of parents and professional school employees.

Student Enrollment	Committee Size
1-150	2 or 4[1]
151-300	4
301-500	6
501-800	8
Over 800	10

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[1] As determined and announced in advance by the planning committee, given the number of professional employees and parents equally available to serve.

(2) In addition to the above, a student may also serve on the committee.

b. Liaison Members. The school principal, a union representative, and the installation commander (or designee) shall be invited to serve as liaison members of the committee. The union may designate a representative to attend and participate in committee meetings in the case of a union having been granted recognition in that school. If more than one union is recognized, each union shall be invited to provide a representative. Liaison members may participate in meetings, but not vote.

B. OPERATION OF COMMITTEES

1. Committee Meetings

a. Meetings. The time and date of advisory committee meetings shall be decided by each committee, announced publicly, and conducted after school instructional hours.

b. Frequency. Regular advisory committee meetings shall be scheduled monthly during the school year, or more often if needed.

c. Public Meetings. Advisory committee meetings shall be open to the public. Members of organizations, such as the Panama Canal Commission, are encouraged to attend.

d. Agenda. The committee chair shall prepare a proposed agenda for each meeting. The final agenda shall be published before committee meetings and shall be available in the school (or installation commander's) office.

e. Minutes. Minutes shall be kept of the proceedings of each meeting. Once approved by the committee members, official minutes shall be published and made available in the school (or installation commander's) office. In addition, minutes may be distributed outside the school.

2. Committee Procedures

a. Conducting Meetings. Each advisory committee shall adopt a set of rules (such as Robert's Rules) for conducting regular meetings and bylaws for governing the committee's internal affairs.

b. Goals and Objectives. To provide focus and direction to the work of an advisory committee, goals and objectives shall be determined for each school year. At the end of the school year, a written report shall be prepared which indicates the degree to which the goals and objectives were attained, and forwarded to the principal, installation commander, and Advisory Council on Dependents' Education. A copy of the report shall be available for review at all times.

c. Officers. The voting members of an advisory committee shall elect a chair, vice chair, and secretary to conduct committee business.

Liaison members are not eligible for these offices. The authorities and responsibilities of the committee officers shall be stated in the bylaws (see B.2.a). In developing the bylaws, consideration should be given to empowering an executive committee (chair, vice chair, secretary) with the authority to convene emergency meetings, of the executive or full committee.

d. Subcommittees. The advisory committees may formulate regular standing or ad hoc committees to address specific goals and objectives and discrete areas of responsibility.

e. School Community Communication. The advisory committees shall provide two-way communication between the community and the committee. Not only should minutes be shared with the community (as specified in paragraph B.1.e.), but links established to ensure that inputs are made by community groups with interests in educational programs. Should special advisory councils for the handicapped or vocational education exist in the community, they should be encouraged to communicate with the local advisory committee on pertinent educational matters.

f. Compensation. Advisory committee members shall serve without pay. However, professional school employees (except principals and Union Representatives) serving on local advisory committees shall earn a maximum of 20 recertification renewal units per school year at the rate of 2 renewal units per meeting. Such employees who also serve on installation advisory committees shall earn an additional 20 recertification units per school year, at the rate of 2 renewal units per meeting.

3. Committee Functional Responsibilities

a. Local Responsibilities

(1) The school advisory committee is responsible for advising the principal on all matters affecting the operation of the school. Committee matters include: school policies, instructional programs, staffing as it relates to the instructional programs, budget, facilities, maintenance, administrative procedures, pupil personnel services, educational resources, program evaluation, student standards of conduct, school meal programs, and other educational-related matters.

(2) The installation advisory committee is responsible for advising the installation commander on improvements for dependents' education within the jurisdiction of the commander. Although this advisory function shall normally focus on matters related to administrative and logistic support, this does not preclude advice on any other school matter that falls within the jurisdiction of the installation commander.

b. Extralocal Responsibilities. The advisory committees shall provide comments and recommendations on policy and resources allocation that are decided at higher levels but that impact upon local schools and installations.

(1) Policy. Policy matters being considered by the Advisory Council on Dependents' Education, Director, Department of Defense Dependents Schools, and Congress; and DoD policy matters that affect overseas dependents' schools.

(2) Resources. Budget plans and priorities for local schools, including participation in the annual budget formulation process, and DoD budget plans and priorities that affect local school operations.

4. Communication Processes

a. Recommendations made by advisory committees to the school principal or installation commander shall be communicated formally in writing and summarized as part of the minutes of advisory committee meetings.

b. The school principal or installation commander who receives advisory committee recommendations has 2 weeks to respond in writing. Informal discussion of recommendations between the recipient and advisory committee representatives is encouraged before the formulation of a written response.

c. Recommendations that cannot be decided locally because of insufficient authority or resources shall be forwarded to the next higher authority (regional director or military commander) for action. Appropriate committees may be formed at the regional and theater levels at the discretion of the regional director and Unified Commander to expedite the handling of communications from both advisory committees. Recommendations that cannot be decided at the regional and theater levels shall be forwarded by the recipients to higher authority in the dependents' schools or military hierarchy. Any recommendation that is forwarded to the Director for a decision shall be sent via the Advisory Council on Dependents' Education for the Council's comments and suggestions. Recommendations must be forwarded to higher authority for action within 1 month of their receipt, with a copy of the correspondence provided to the advisory committee that originated the recommendations. The official who takes action on recommendations shall respond in writing to the appropriate advisory committee within 1 month or upon receipt of such recommendation. The Director of Dependents Schools shall respond in writing within 1 month of the close of the last meeting of the Advisory Council on Dependents' Education.

d. An advisory committee may appeal a decision on a recommendation to the next level of authority in the dependents' schools or military structure. Recipients shall have 1 month from the date of receipt to appeal in writing. In the event of a negative response, an advisory committee may continue the appeal process for a decision through each appropriate hierarchical level in either the dependents' schools or the military structure. Any appeal forwarded to the Director of Dependents Schools for a decision shall be sent through the Advisory Council on Dependents' Education for the Council's comments and suggestions.

e. An advisory committee may communicate informally at any time with any appropriate office in the dependents' schools or military structure and with the Advisory Council on Dependents' Education. This informal communication does not require an official response (as is required in paragraph

4.c. and 4.d., above). Copies of such communications may be distributed to appropriate offices in the dependents' schools or military hierarchy.

f. At the end of each school year, an advisory committee shall write an assessment of its effectiveness as an advisory body and its working relationship with the school principal or installation commander. This assessment may be included as part of the report of attainment of goals and objectives cited in section B.2.b., and shall be made available to the school principal, installation commander, and Advisory Council on Dependents' Education.

APPENDIX C. ED NOTICE OF PROPOSED RULEMAKING CONCERNING LOCAL ADVISORY COMMITTEES (34 CFR Part 805)

DEPARTMENT OF EDUCATION

34 CFR Part 805

Local Advisory Committees; Overseas Dependents' Schools

AGENCY: Department of Education.

ACTION: Notice of Proposed Rulemaking.

SUMMARY: The Secretary proposes regulations for the first time on the qualifications for election to local advisory committees of the Overseas Dependents' Schools and on procedures for conducting elections of advisory committee members. The Defense Dependents' Education Act of 1978, as amended by the Department of Education Organization Act requires the Secretary to prescribe these regulations in consultation with the Secretary of Defense.

DATES: Comments must be received on or before January 6, 1981.

ADDRESSES: Comments should be addressed to Dr. William L. Smith, U.S. Department of Education, Room 3017, 400 Maryland Avenue, S.W., Washington, D.C. 20202.

FOR FURTHER INFORMATION CONTACT: Dr. Thomas E. Powers, U.S. Department of Education, Room 3017, 400 Maryland Avenue, S.W., Washington, D.C. 20202. Telephone No. 202/245-8011.

SUPPLEMENTARY INFORMATION: A Department of Defense (DOD) directive will establish the advisory committees for the 1980–1981 school year. Once the proposed regulations are in force, they will supersede the DOD directive with respect to rules governing qualifications for election to these committees and procedures for conducting elections of advisory committee members.

Invitation to Comment: Interested persons are invited to submit comments and recommendations regarding the proposed regulations. Written comments and recommendations may be sent to the address given at the beginning of this preamble. All comments received on or before the 60th day after publication of this document will be considered in the development of the final regulations. all comments submitted in response to these proposed regulations will be availble for public inspection, during and after the comment period, in Room 3017, 400 Maryland Avenue, S.W., Washington, D.C. between the hours of 8:30 a.m. and 4:00 p.m., Monday through Friday of each week except Federal holidays.

Citation of Legal Authority: A citation of statutory or other legal authority is placed in parentheses on the line following each substantive provision of these proposed regulations.

(Catalog of Federal Domestic Assistance No. N/A)

Dated: November 3, 1980.

Steven A. Minter,

Under Secretary of Education.

The Secretary proposes a new Part 805 of 34 CFR to read as follows:

PART 805—OVERSEAS DEPENDENTS' SCHOOLS: ADVISORY COMMITTEES

Subpart A—General

Sec.

805.1 Overseas dependents' schools: advisory committees.

805.2 What is the function of a school advisory committee?

805.3 What is the function of an installation advisory committee?

805.4 What definitions apply to overseas dependents' schools: advisory committees?

Subpart B—Establishment of Advisory Committees

805.10 Who establishes advisory committees? How many are established?

Subpart C—The Planning Committee: Functions and Composition

805.20 What is a planning committee?

805.21 Who shall serve as the initial chairperson of a planning committee?

805.22 What is the composition of a planning committee?

805.23 What are the responsibilities of a planning committee?

Subpart D—The School Advisory Committee: Composition, Qualifications, and Election

805.30 What is the composition of a school advisory committee?

805.31 What procedures apply prior to the election of a school advisory committee?

805.32 What are the qualifications for election?

805.33 What are the qualifications for voting?

805.34 What are the procedures for voting?

805.35 What is the date of election?

805.36 What is the tenure of members of a school advisory committee?

805.37 How is a vacancy filled on a school advisory committee?

Subpart E—The Installation Advisory Committee: Composition and Election

805.40 What is the composition of an installation advisory committee?

805.41 How are members chosen?

805.42 How is a vacancy filled on an installation advisory committee?

Subpart F—Fiscal Requirements

805.50 Do members of an advisory committee receive pay?

Authority: Section 1410(b) of the Defense Dependents' Education Act of 1978, as enacted by Pub. L. 95-561, 92 Stat. 2365–70 and amended by the Department of Education Organization Act, Pub. L. 96-88, 93 Stat. 693 (20 U.S.C. 928).

Subpart A—General

§ 805.1 Overseas dependents' schools: advisory committees.

The regulations in this Part 805 govern the composition and election of school advisory committees and installation advisory committees for overseas dependents' schools. (20 U.S.C. 928)

§ 805.2 What is the function of a school advisory committee?

A school advisory committee advises the principal of an overseas dependents' school on the operation of that school and makes recommendations regarding curricular and budgetary matters. (20 U.S.C. 928(a)(1))

§ 805.3 What is the function of an installation advisory committee?

(a) An installation advisory committee advises the commander of a military installation served by two or more overseas dependents' schools on matters concerning dependents' education within the jurisdiction of that commander.

(b) If a military installation is served by only one overseas dependents' school, the school advisory committee of that school shall perform—in addition to its own function as described in § 805.2—the function of the installation advisory committee. (20 U.S.C. 928(a)(2))

§ 805.4 What definitions apply to overseas dependents' schools: advisory committees?

The following definitions apply in these regulations:

"Military installation" means a local geographic area—

(a) Located outside the United States and

(b) Under the jurisdiction of a United States military commander.

"Overseas dependents' school" means an educational institution administered by the Office of Dependents' Education in the Department of Defense under the Defense Dependents' Education Act of 1978, Pub. L. 95-561, title XIV.

"Parent" means a father, mother, legal guardian, person standing in place of a parent, or a spouse whose dependent is eligible to enroll in an overseas dependents' school because of that "parent's"—

(a) Employment:
(b) Marital status:
(c) Military status; or
(d) Payment of tuition.

"School employee" means a person employed in an overseas dependents' school.

"United States" means, for purposes of these regulations, the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, and the possessions of the United States (excluding the Trust Territory of the Pacific Islands and Midway Island).

(20 U.S.S. 928, 932(4))

Subpart B—Establishment of Advisory Committees

§ 805.10 Who establishes advisory committees? How many are established?

The Director of Dependents' Education, Office of Dependents' Education, Department of Defense—

(a) Establishes a school advisory committee for each overseas dependents' school; and

(b) Establishes an installation advisory committee for each military installation with two or more overseas dependends' schools.

(20 U.S.C. 928)

Subpart C—The Planning Committee: Functions and Composition

§ 805.20 What is a planning committee?

Each overseas dependents' school shall have a planning committee to—

(a) Conduct the election of the school advisory committee; and

(b) Carry out the responsibilities described in § 805.23 and § 805.31(b).

(20 U.S.C. 928)

§ 805.21 Who shall serve as the initial chairperson of a planning committee?

In the 1980–81 school year or in the first year of operation of a new overseas dependents' school, the principal of the school shall perform the functions of the chairperson of the planning committee.

(20 U.S.C. 928)

§ 805.22 What is the composition of a planning committee?

A planning committee shall consist of the following:

(a) The elected chairperson of the school advisory committee, who shall form and chair the planning committee.

(b) Parents of students enrolled in the school.

(c) Professional employees of the school. For purposes of this paragraph, the term "professional employee"—

(1) Means a professional educator or other professional staff members of the school such as an education program manager, an assistant principal, a teacher, a pupil personnel specialist, a librarian, a media specialist, or a nurse; but

(2) Does not include the principal of that school except as provided in § 805.21.

(d) The commander of the military installation which the school serves or the commander's designee; and

(e) As appropriate, students enrolled in the school.

(20 U.S.C. 928)

§ 805.23 What are the responsibilities of a planning committee?

A planning committee shall be responsible for the following:

(a) The duties described in § 805.31(b), dealing with procedures prior to the election of a school advisory committee.

(b) Soliciting candidates who are eligible and willing to serve on the school advisory committee.

(c) Making necessary arrangements for conducting the election.

(d) Ensuring that the ballot includes—

(1) The names of all eligible and willing candidates; and

(2) Provision for write-in candidates.

(e) Supervising the election.

(f) Tabulating the votes.

(g) Certifying the results of the election.

(h) Publishing the results of the election as soon as possible following the election.

(20 U.S.C. 928)

Subpart D—The School Advisory Committee: Composition, Qualifications, and Election

§ 805.30 What is the composition of a school advisory committee?

(a) (1) The membership of the school advisory committee shall include an equal number of parents of students enrolled in that school and professional employees of that school, as defined in § 805.22(c).

(2) The total number of members who are parents or professional employees shall be in accord with the following:

School enrollment	Committee members
1–150	2 or 4
151–300	4 or 6
301–500	6 or 8
501–800	8 or 10
More than 800	10, 12, 14, or 16

(b) The membership of the school advisory committee may in addition include a student enrolled in that school.

(c) The school advisory committee shall invite the principal of that school and the commander of the military installation served by the school (or the commander's designee) to participate in committee meetings on a liaison (nonvoting) basis.

(20 U.S.C. 928)

§ 805.31 What procedures apply prior to the election of a school advisory committee?

(a) Prior to the election of a school advisory committee, the chairperson of the planning committee shall make generally known—through publication of an announcement or similarly effective means—the following:

(1) (i) The formation of a planning committee to nominate candidates for the school advisory committee; and

(ii) The names of members of the planning committee.

(2) Eligibility criteria for candidates for the school advisory committee.

(b) At least two weeks in advance of the election of the school advisory committee, the planning committee shall make generally known—through publication of an announcement or similarly effective means—the following:

(1) The date of the election.
(2) The hours of voting.
(3) The voting places.
(4) The names of the candidates.
(5) Information about voter eligibility.

(20 U.S.C. 928)

§ 805.33 What are the qualifications for election?

(a) To qualify for election to the school advisory committee, a person must be one of the following:

(1) A parent of a student enrolled in that school.

(2) A professional employee of that school as defined in § 805.22(c).

(b) At the discretion of the planning committee in consultation with the principal of the school, a student enrolled in that school may qualify for election. There is no minimum age qualification for a student to serve on the school advisory committee.

(20 U.S.C. 928)

§ 805.32 What are the qualifications for voting?

To vote in the election of a school advisory committee, a person must be at least 18 years of age and one of the following:

(a) A parent of a student enrolled in that school.

(b) An employee of that school.

(c) A student who is enrolled in that school.

(20 U.S.C. 928(b))

§ 805.34 What are the procedures for voting?

(a) Qualified voters shall elect members of a school advisory committee by secret ballot.

(b) (1) The names of all candidates shall be on the ballot.

(2) Each name shall be arranged alphabetically under one of the following categories, as appropriate:

(i) Parent.

(ii) School employee.

(iii) Student.

(3) The number of committee members authorized from each category shall be indicated on the ballot.

(c) In any category referred to in paragraph (b)(2) of this section, a voter may vote for as many candidates as are authorized from that category for membership on the school advisory committee.

(d) A voter may vote for fewer than the maximum number of candidates authorized from any category. However, a voter may cast only one vote for a particular candidate.

(e) The planning committee shall invalidate any ballot containing votes in excess of the maximum number authorized.

(f) The candidates with the highest number of votes are elected.

(g) In case of a tie vote, the tied candidates, under the supervision of the planning committee, shall employ some chance procedure (e.g., cast lots) to determine a winner.

(h) In any category a candidate who receives an insufficient number of votes to be elected shall be designated as an alternate committee member.

(i) In each category alternate committee members are ranked in order of the number of votes each received.

(20 U.S.C. 928)

§ 805.35 What is the date of election?

A planning committee shall conduct an election for a school advisory committee at the beginning of each school year and shall complete the election process no later than October 15.

(20 U.S.C. 928)

§ 805.36 What is the tenure of members of a school advisory committee?

(a) The term of an elected member of a school advisory committee is one year.

(b) An elected member may not serve more than three consecutive terms.

(20 U.S.C. 928)

§ 805.37 How is a vacancy filled on a school advisory committee?

If a vacancy occurs on a school advisory committee, the chairperson of the committee shall appoint, to fill that unexpired term, an alternate from the appropriate category in the order referred to in § 805.34(i).

(20 U.S.C. 928)

Subpart E—The Installation Advisory Committee: Composition and Election

§ 805.40 What is the composition of an installation advisory committee?

An installation advisory committee consists of one parent member and one school employee member of the school advisory committee of each overseas dependents' school serving that military installation.

(20 U.S.C. 928)

§ 805.41 How are members chosen?

(a) A school advisory committee shall select as its representatives to the installation advisory committee the parent member and the school employee member who received the highest number of votes in their respective categories in the election of the school advisory committee.

(b) If any person referred to in paragraph (a) of this section declines to serve on the installation advisory committee, the school advisory committee shall fill the vacancy according to the procedures in § 805.42.

(20 U.S.C. 928)

§ 805.42 How is a vacancy filled on an installation advisory committee?

If a vacancy occurs on an installation advisory committee, that position shall be filled by the person receiving the next highest number of votes in the appropriate category in the election of the school advisory committee.

(20 U.S.C. 928)

Subpart F—Fiscal Requirements

§ 805.50 Do members of an advisory committee receive pay?

A member of a school advisory committee or a member of an installation advisory committee may not receive pay for serving on that committee.

(20 U.S.C. 928(c))

[FR Doc. 80-34725 Filed 11-6-80; 8:45 am]

BILLING CODE 4000-01-M

APPENDIX D. CHARTER OF THE OVERSEAS DEPENDENTS SCHOOLS NATIONAL ADVISORY PANEL ON THE EDUCATION OF HANDICAPPED DEPENDENTS

40938 Federal Register / Vol. 45, No. 142 / Tuesday, July 22, 1980 / Notices

Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents; Charter

AGENCY: Office of the Secretary of Defense.

ACTION: Charter of the Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents.

SUMMARY: The Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents advises the Director, DoD Dependents Schools (DoDDS) of unmet needs within the system for the education of handicapped children. The Panel comments publicly on any rules and regulations proposed for issuance by the Office of Dependents Schools (ODS) r ding the education of handicapped c ren and on the procedures for distribution of funds. The Panel assists ODS in developing and reporting all data and evaluation as may assist the Director in the performance of his responsibilities under section 618 of Pub. L. 94-142.

FOR FURTHER INFORMATION CONTACT: Dr. Diane L. Goltz, Coordinator, Special Education, DoD Dependents Schools, 2461 Eisenhower Avenue, Alexandria, VA 22331, telephone 202-325-7810.

The following is the Charter of Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents.

M. S. Healy,

OSD Federal Register Liaison Officer, Washington Headquarters Services, Department of Defense.

July 17, 1980.

Charter

Overseas Dependents Schools National Advisory Panel on the Education of dicapped Dependents

. *Authority:*

a. Defense Dependent's Education Act (Section 1402 and Section 1402, Title SIV, Pub. L. 95-561; 20 U.S.C. 929) enacted November 1, 1978.

b. Pub. L. 94-142, the Education for All Handicapped Children Act of 1975 (Section 613a).

c. Federal Advisory Committee Act (Pub. L. 92-463; 5 U.S.C. Appendix I).

2. *Official Designation:* Overseas Dependents Schools National Advisory Panel on the Education of Handicapped Dependents, hereafter referred to as the Panel.

3. *Objectives and Scope:* The Departments of Defense Dependent's Schools (DoDDS) Panel, composed of education officials and adminstrators of programs for handicapped children, (a) advises the DoD dependents schools overseas of unmet needs within the system for the education of handicapped children; (b) comments publicly on any Office of Dependents Schools (ODS) rules or regulations proposed for issuance by ODS regarding the education of handicapped children and on the procedures for distribution of funds; and (c) assists ODS in developing and reporting such data and evaluations as may assist the Director in the performance of his responsibilities under section 618 of Pub. L. 94-142.

4. *Time Required to Carry Out the Purpose of the Panel:* In accordance with Pub. L. 94-142 (section 121a.650), the Panel shall continue in existence indefinitely.

5. *Official to Whom the Panel Reports:* The Panel reports to the Director of the Department of Defense Dependents Schools.

6. *Agency Responsible for Providing Support Services:* The Department of Defense provides support services to the Panel.

7. *Functions and Procedures of the Panel:* The Panel Shall:

a. Review information regarding unmet needs of exceptional children.

b. Receive input from various consumer and special interest groups.

c. Establish committees for short-term purposes composed of representatives from consumer and special-interest groups.

d. Review a copy of written findings of fact and decisions from each impartial due-process hearing.

e. Assist regional offices in developing and reporting such information and evaluations as may assist ODS in the performance of its duties under Sections 200, 900, and 1105 of ODS Program Standards and Guidelines.

f. Make recommendations for changes in the budget, general management of the special education program, and policy and procedure changes based on program and operational information.

g. Comment publicly on rules or standards regarding the education of exceptional children.

h. Perform such other tasks as may be required by the Director.

8. *Structure:*

a. The membership of the Panel is composed of persons involved in or concerned with the education of handicapped children. The membership must include at least one representative of each of the following groups:

(1) Handicapped individuals
(2) Teachers of handicapped children
(3) Parents of handicapped children
(4) ODS and regional educational officials
(5) Special education program administrators

b. Pub. L. 94-142 comment (sections 121a.651) allows ODS to expand the Panel to include additional persons in the groups listed: "The membership of the State advisory panel, as listed in paragraphs (a)(1)-(5), is required in section 613(1)(12) of the Act. As indicated in paragraph (b), the composition of the Panel and the number of members may be expanded at the discretion of the State. In adding to the membership, consideration could be given to having:

1. An appropriate balance between professional groups and consumers (i.e., parents, advocates, and handicapped individuals);

2. Broad representation within the consumer-advocate groups, to insure that the interests and points of view of various parents, advocates and handicapped individuals are appropriately represented.

3. Broad representation within professional groups (e.g., (a) regular education personnel, (b) special educators, including teachers, teacher trainers, and administrators, who can properly represent various dimensions in the education of handicapped children, and (c) appropriate related services personnel); and

4. Representatives from other State advisory panels (e.g., 10-15 members). The Panel itself could take steps to insure that it (1) consults with and receives input from various consumer and special interest professional groups, and (2) establishes committees for the particular short-term purposes composed of representatives from those input groups."

9. *Length of Term:* The term of office of each member of the Panel appointed shall be 1 year. Any member appointed to fill a vacancy occurring before the expiration of the term for which his or her predecessor was appointed shall be appointed for the remainder of such term.

10. *Estimated Annual Operating Cost:* The estimated annual operating cost for the Panel is $37,000 which includes travel and per diem for members, but excludes staff support.

11. *Number and Frequency of Meetings:* The Panel meets at least three times each calendar year.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

Army members whose medical fitness for continued service has been questioned either by the member or his/her commander.

CATEGORIES OF RECORDS IN THE SYSTEM:

File contains documents reflecting determination by a board of medical fitness for continued Army active service. Includes medical board proceedings and related documents.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:

Title 5 U.S.C., Section 301; Title 10 U.S.C., Section 1071; and Title 10 U.S.C., Section 1201, Chapter 61.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND THE PURPOSES OF SUCH USES:

Medical board: To determine medical fitness for continued Army active service.

Physical Evaluation Board (PEB): To review medical board findings when required and to determine if the individual should be discharged, temporarily or permanently retired for disability, or retained for active service.

USAPDA: Record of cases considered, adjudications, reviews, determinations, and dispositions. To respond to inquiries received from a member, other Government agency, or other authorized recipient of requested information. Information in computer form consists of profile data, resume of board action and results, maintained primarily for statistical reports. No decisions about member are made from automated data.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM.

STORAGE:

Paper records in file holders.

USAPDA: Paper records in file folders and magnetic diskettes. Magnetic diskettes contain personal information on members, certain codes of specific type of injuries for research study purposes, and Veterans Administration Schedule for Rating Disability Diagnostic Codes only. Paper files are the PEB proceedings describing the medical problem, and findings, recommendations, and adjudicative decision.

RETRIEVABILITY:

Filed chronologically by name.

USAPDA: Paper files, filed chronologically by name and fiscal year on 5" x 8" file cards. Retrieval from magnetic diskettes files can be accomplished by PRG program or a DFU load program.

SAFEGUARDS:

Rooms are secured by locked doors when not in use. Records are maintained in areas accessible only to authorized personnel who are properly screened and trained.

USAPDA: In addition to the preceding, operation of data processing equipment and magnetic tapes are limited strictly to authorized personnel. Computer has key lock and key is controlled. Magnetic diskettes are stored and controlled to ensure that they do not result in unauthorized disclosure of personal information.

RETENTION AND DISPOSAL:

Medical boards: Retained for 5 years and destroyed.

PEBs: Retained for 2 years or until discontinued, whichever occurs first.

USAPDA: Retained for 5 years and destroyed.

SYSTEM MANAGER(S) AND ADDRESS:

The Surgeon General, Headquarters, Department of the Army, The Pentagon, Washington, DC 20310.

NOTIFICATION PROCEDURE:

Information may be obtained by written request to: HQDA (DASG–AOM), Room 2D–433, The Pentagon, Washington, DC 20310.

RECORD ACCESS PROCEDURES:

Requests should be addressed to: Office of The Surgeon General, Headquarters, Department of the Army (DASG–AOM), Room 2D–433, The Pentagon, Washington, DC 20310.

All requests should be written, since files are not stored in Headquarters, Department of the Army. If telephone conversation is desired, at the expense of the inquirer, area code and telephone number should be furnished.

Personal visits by the individual requesting access may be arranged only with the official assigned to respond to a written request.

CONTESTING RECORD PROCEDURES:

The Army's rules for access to records and for contesting contents and appealing initial determinations may be obtained from the official responding to a written request.

RECORD SOURCE CATEGORIES:

Interview with the individual; medical records on the individual; and reports of medical boards and PEBs.

SYSTEMS EXEMPT FROM CERTAIN PROVISIONS OF THE ACT:

None.

[FR Doc. 80–[illegible] Filed 7–21–80; 8:45 am]

BILLING CODE 3710–08–M

Army Science Board; Open Meeting

In accordance with Section 10(a)(2) of the Federal Advisory Committee Act (Pub. L. 92–463), announcement is made of the following committee meeting:

Name of the committee: Army Science Board.

Dates of meeting: August 11–12, 1980.

Place: The Pentagon, Washington, DC (exact room location can be obtained by contacting Helen Pipon at 202–697–[illegible]).

Time: 0800–1630 hours, August 11, 1980; 0800–1630 hours, August 12, 1980.

Proposed Agenda

The ASB Ad Hoc Sub-Group on Energy Needs of the Army will meet to receive briefings and hold discussions on the following issues: (a) Current and projected mobility, weapons systems, and installation requirements for energy in the Army; (b) identification of research and development efforts which might alleviate projected shortfalls; (c) identification of alternative energy sources. This meeting is open to the public. Any interested person may attend, appear before, or file statements with the committee at the time and in the manner permitted by the committee.

Helen A. Pipon,

Administrative Officer.

[FR Doc. 80–[illegible] Filed 7–21–80; 8:45 am]

BILLING CODE 3710–08–M

APPENDIX E. NUMBER OF DoDDS SCHOOLS IN THE VARIOUS STAGES OF THE ACCREDITATION PROCESS WITH THE NORTH CENTRAL ASSOCIATION OF COLLEGES AND SCHOOLS

October 1980	ATLANTIC	N.GERMANY	S.GERMANY	MED	PACIFIC	PANAMA	TOTALS
Secondary Schools:							
NCA Accredited	11	12	10	14	11	2*	60
Pending Accreditation NCA Conf. (81)	0	0	1	0	0	0	1
Total Secondary Schools	11	12	11	14	11	2*	61
Junior High/Middle Schools:							
NCA Accredited	0	2	0	0	5	0	7
Initial Visit(80-81)	1	2	0	0	1	0	4
Accreditation/Evaluation Planned	2	6	4	0	1	1	14
Total Junior High/Middle Schools	3	10	4	0	7	1	25
Elementary Schools:							
NCA Accredited	8	6	5	6	13	0	38
Initial Visit Scheduled (80-81)	5	10	6	4	0	5	30
Pending Accreditation NCA Conf. (81)	4	5	6	4	0	0	19
Accreditation/Evaluation Planned	11	33	33	5	11	7	100
Total Elementary Schools	28	54	50	19	24	12	187
Summary Tabulation:							
No. Accredited	19	20	15	20	29	2	105
Initial Visit Scheduled (80-81)	6	12	6	4	1	5	34
No. Pending	4	5	7	4	0	0	20
No. Planned	13	39	37	5	12	8	114
Total No. of Sch.	42	76	65	33	42	15	273
Accredited College	0	0	0	0	0	1*	1
Total Number of Schools and Colleges	42	76	65	33	42	16	274

*Accredited by Middle States Association

APPENDIX F. DoDDS MEDIA PROGRAM SURVEY FOR SCHOOL YEAR 1979-80

Data Base:

Region	Enrollment	Schools
Atlantic (ATL)	14,870	42
Germany North (G-N)	45,000	74
Germany South (G-S)	33,777	62
Mediterranean (MED)	13,075	39
Panama (PAN)	7,698	15
Pacific (PAC)	21,596	40
	136,016	272

1. SCHOOL MEDIA CENTER STAFFING

	Full-time			Part-time		
	PL	GS	LN	PL	GS	LN
ATL	25	4	15	4	0	6
G-N	54	29	21	4	9	12
G-S	33	29	8	0	6	11
MED	26	3	16	3	1	9
PAN	11	4	0	0	0	0
PAC	50	0	48	1	0	0
	199	69	108	12	16	38

2. REGIONAL MEDIA CENTER STAFFING (FULL-TIME)

	GS MEDIA COORD.	GS PROF. LIBRARIAN	GS MEDIA CLERK/AIDE	GS MEDIA TECH.	LOCAL NATL. MEDIA TECH.
ATL	1	0	0	0	2
G-N	1	0	0	0	0
G-S	1	1	1	0	3
MED	1	0	0	0	3
PAN	1	0	0	2	0
PAC	1	0	0	0	3
	6	1	1	2	11

3. REGIONAL MEDIA CENTER COLLECTIONS

	Prof Books	Ency Sets	Periodicals	Microforms	AV Matls
ATL	150	1	52	0	0
G-N	0	2	132	0	0
G-S	10,500	4	583	336	125
MED	1,000	1	48	0	0
PAN	323	2	25	0	0
PAC					

4. REGIONAL FILM CENTER COLLECTIONS

	Nr. of Centers	16mm Films	Videotapes	Other AV	Other
ATL	3	5,000	35	820	0
G-N	1	5,500	0	0	0
G-S	2	3,302	0	150	80 Slide Sets
MED	3	3,800	0	0	231 Kits
PAN	1	4,095	0	0	0
PAC	2	6,850	1,287	0	0
DoDDS	12	28,547	1,322	970	331.

5. SCHOOL MEDIA CENTER FACILITIES

	Square Feet	Seating Capacity	Seating as % of Total Enrl.
ATL	91,908	1,921	13%
G-N	125,869	2,635	6%
G-S	115,874	2,926	9%
MED	81,201	1,903	15%
PAN	23,408	395	5%
PAC	141,280	3,268	15%
DoDDS	579,540	13,048	9,6%

6. SCHOOL MEDIA CENTER COLLECTIONS

	Library Books	Encyl. Sets	Periodicals	AV Materials (Incl. microforms)
ATL	289,079	126	1,507	56,626
G-N	599,463	295	2,841	91,158
G-S	476,182	228	1,792	78,765
MED	320,210	153	1,610	66,883
PAN	87,728	17	256	2,769
PAC	359,790	239	1,704	101,734
DoDDS	2,132,452	1,058	9,710	397,935

7. SCHOOL MEDIA CENTER EXPENDITURES - TOTALS

	Library Books	Encyl. Sets	Periodicals	AV Matls.	Equipment	TOTAL
ATL	$ 63,750	$10,950	$ 22,700	$ 66,350	$ 7,050	$ 170,800
G-N	270,000	45,000	45,000	135,000	0	495,000
G-S	135,322	5,000	36,572	134,236	45,000	356,130
MED	54,000	0	19,000	37,222	0	110,222
PAN	417,000	*	11,145	49,000	150,000	627,145
PAC	211,000	**	**	288,000	113,379	612,379
DoDDS	$1,151,072	$60,950	$134,417	$709,808	$315,429	$2,371,676

* Included in book budget
** Included in book budget

8. SCHOOL MEDIA CENTER EXPENDITURES - PER PUPIL AVERAGES

	Library Books	Encyl. Sets	Periodicals	AV Matls.	Equipment	PER PU TOTAL
ATL	$ 4.29	$ .73	$1.50	$ 4.46	$ .48	$11.48
G-N	6.00	1.00	1.00	3.00	.00	11.00
G-S	4.01	.15	1.08	3.97	1.33	10.54
MED	4.13	.00	1.45	2.85	.00	8.43
PAN	54.16	*	1.45	6.37	19.48	81.46
PAC	9.77	**	**	13.33	5.25	28.35
DoDDS	$ 8.46	$ .45	$ .99	$ 5.22	$ 2.32	$17.44

9. REGIONAL MEDIA CENTER EXPENDITURES - TOTALS

	Prof. Books	Encyl. Sets	Periodicals	Microform	Film/ Video	Other	Equipment	TOTAL
ATL	$ 0	$ 0	$ 1,820	$ 0	$ 0	$ 0	$ 0	$ 1,820
G-N	0	1,500	2,000	22,000	100,000	0	0	125,500
G-S	2,792	1,500	12,924	2,720	36,651	500	7,000	64,087
MED	0	0	390	0	3,000	0	2,000	5,390
PAN	2,000	0	5,000	500	20,000	5,000	10,000	42,500
PAC	1,000	0	4,000	0	5,000	3,000	5,000	18,000
DoDDS	$5,792	$3,000	$26,134	$25,220	$164,651	$8,500	$24,000	$257,297

10. TOTAL SCHOOL AND REGIONAL MEDIA CENTER EXPENDITURES

	SCHOOL MEDIA CENTERS		REGIONAL MEDIA CENTERS		GRAND TOTALS	
	TOTAL	PER PUPIL	TOTAL	PER PUPIL	TOTAL	PER PUPIL
ATL	$ 170,800	$11.48	$ 1,820	$ .12	$ 172,620	$11.60
G-N	495,000	11.00	125,500	2.80	620,500	13.80
G-S	356,130	10.54	64,087	1.90	420,217	12,44
MED	110,222	8.43	5,390	.41	115,612	8.84
PAN	627,145	81.46	42,500	5.52	669,645	86.98
PAC	612,379	28.36	18,000	.83	630,379	29.19
DoDDS	$2,371,676	$17.44	$257,297	$1.89	$2,628,973	$19.33

11. AVERAGE RATIOS OF SCHOOL MEDIA CENTER COLLECTIONS TO PUPILS & SCHOOLS

a. Library Books

	Books Per Pupil	Books Per School
ATL	20	6,883
G-N	14	8,101
G-S	15	7,681
MED	25	8,211
PAN	12	5,849
PAC	17	8,995
DoDDS	16	7,840

b. Encyclopedia Sets

	Pupils Per Set	Sets Per School
ATL	118	3
G-N	152	4
G-S	148	4
MED	85	4
PAN	453	1
PAC	90	6
DoDDS	129	4

C Periodicals/Newspapers

	Pupils Per Item	Items Per School
ATL	10	36
G-N	16	38
G-S	19	29
MED	8	41
PAN	30	17
PAC	13	43
DoDDS	14	36

d. AV Materials (incl. Microforms)	Items Per Pupil	Items Per School
ATL	4	1,348
G-N	2	1,232
G-S	2.3	1,270
MED	5	1,715
PAN	.4	185
PAC	5	2,543
DoDDS	3	1,463

e. 16mm Films	Pupils Per Film	Films Per School
ATL	3	119
G-N	8	75
G-S	10	53
MED	3.5	98
PAN	2	273
PAC	3	171
DoDDS	4.75	105

APPENDIX G. RESEARCH AND IMPROVEMENT ACTIVITIES AVAILABLE TO CIMARON, KANSAS

Although Kansas has no legislatively established intermediate service agencies, there are eight regional resource centers that serve schools. The school district on which this case focuses, Cimarron, is located in southwestern Kansas. The case describes the resources available for improving educational services in Cimarron; no claims are made that those resources are actually used.

Teachers and administrators in Cimarron who have requests for specific information can go to the Dodge City Community College, which houses an ERIC collection and also has computer capability to search other data bases (e.g. psychological abstracts, dissertation abstracts). Since the resource center at the community college is partially funded through an NIE State Dissemination Capacity Building Grant and is closely tied to the State Education Agency, Cimarron practitioners also have access to the SEA's professional library and the state library system. Through the tie to the SEA, there is also access to files of documents produced in Kansas, promising practices and programs, names of near by consultants, and legislative materials.

Field consultants also provide services to Cimarron. These experts are based in Wichita and regularly visit, telephone, and provide written materials to Cimarron. The field consultants are funded from a variety of sources including the State Dissemination Capacity Building Grant, the National Diffusion Network, the Women's Educational Equity Act Program, Teacher Centers, Title IV-C of ESEA, and the state. The fact that the sources of funds include a number of Federal programs means that the field agents can provide help to Cimarron if the district chooses to adopt and implement a new program. If the agents themselves do not have the knowledge and skills to provide the assistance, through the Federal programs, they are able to identify experts (both within Kansas and elsewhere) who are capable of doing so. Further, Cimarron is in an area served by a regional educational laboratory (McRel) that has a major focus on serving the needs of rural schools. In addition to the field consultants and generalized resource base, Cimarron is also able to receive both information and technical assistance in implementing the provisions of Public Law 94-142 (Education of the Handicapped). Federal funding supports Special Education networks that include the colleges and universities in Kansas. One specific service, provided by the University of Kansas, is a monthly report on projected needs forspecial education personnel in the district and help in recruitment.

APPENDIX H. PROPOSED INTERDEPARTMENTAL AGREEMENT ON RETENTION OF PERSONNEL BENEFITS UNDER STATUS OF FORCES AGREEMENTS

Statement of Purpose

The legislative history of the Department of Education Organization Act, P.L. 96-88, and the language of the law itself, which provides for the transfer of the overseas dependents schools (DoDDS) from the Department of Defense to the Department of Education, makes Congressional intent clear that there is to be no change in the status quo of the overseas personnel re SOFA matters as a result of the transfer of the overseas dependents' school system from the Department of Defense to the Department of Education (except as such SOFA-related changes which may occur in the future pertain to all other members of the civilian component affected by the same SOFAs).

The purpose of this interdepartmental agreement is to implement Congressional intent by:

(a) ensuring retention of the kind and degree of control and responsibility of U.S. military commanders over the overseas dependents schools personnel of the Department of Education required by U.S. Government obligations under relevant SOFAs, while

(b) reinforcing the basic responsibility of the Department of Education for determining educational policy and programs and actually administering the schools, and

(c) preserving the SOFA-related rights, benefits, and responsibilities of the overseas personnel of the military dependents' schools.

This agreement is intended to serve the foregoing purposes through the following provisions:

I. PROVISION OF PERSONNEL SERVICES BY DOD TO OVERSEAS SCHOOLS

The Department of Defense (DOD) shall continue to provide personnel services and support to the overseas personnel of the overseas dependents' education system ("overseas personnel"; "system") under a master servicing agreement to be executed by the Departments of Defense and Education. Except with respect to professional educational matters and the conduct of the educational program, DOD shall be the final authority regarding such personnel in those countries where the Secretary of Defense finds such authority to be necessary. [Department of Education Organization Act (DEOA) §419(a)(1)]

II. RETENTION OF BENEFITS; CIVILIAN COMPONENT STATUS

(1) Access to services and benefits. DOD shall treat all overseas dependents school personnel of the Department of Education as employees of DOD for the purposes of access to services and facilities provided by DOD and for discipline and direction outside of their educational responsibilities as may be required by the governing status of forces agreement. [DEOA §419(a)(2)]

(2) Civilian component. For the purpose of any status of forces agreement between the United States and other countries or an international organization, DOD shall treat overseas personnel as members of the "civilian component" of the Armed Forces. [DEOA §401(f)]

(3) Enumeration of benefits. DOD shall continue to provide the benefits, services and facilities that DOD accorded to overseas personnel under the governing status of forces agreement prior to the effective date of the transfer of overseas personnel to the Department of Education. Pursuant to this agreement DOD shall assist in maintaining benefits requiring the participation of the host country under the governing status of forces agreement.

III. SUPERVISORY AND ADMINISTRATIVE RESPONSIBILITIES OF DOD

(a) DOD shall provide sufficient administrative control over overseas personnel to meet the United States' international obligations under the governing status of force agreements. DOD shall exercise such control through the appropriate military command. DOD shall exercise sufficient administrative control over such personnel to discharge the United States' obligations under the circumstances, including the identification of personnel. Particular elements of such control include, but are not limited to, those described in articles IV-VIII below.

(b) The regional director of each region of the system shall continue to coordinate and consult with the commander of the appropriate military command on all matters as to which the director coordinated or consulted prior to the effective date of the transfer.

[DEOA §419(a)]

IV. TRAVEL ORDERS

DOD will issue travel orders for official travel of overseas personnel and administrative personnel traveling on official business.

[DEOA §419]

V. PAY

Pursuant to appropriate interagency agreements to be executed by the Departments, DOD shall be responsible for making all wage and salary payments to overseas personnel.

[DEOA §419]

VI. IDENTIFICATION AND DOCUMENTATION

DOD will continue to make arrangements for the issuance of passports, identification cards, and other necessary identification documentation for overseas personnel. Such documents shall identify the bearer as a member of the civilian component of the U.S. military forces.

[DEOA §401(f)]

VII. MOVEMENT AND CONDUCT OF PERSONNEL

(1) General. DOD, in accordance with any applicable agreements with receiving States and through the appropriate command, shall exercise authoritative direction and control over the movement of overseas personnel into and out of military installations or related areas (such as so-called areas of coordination). Such direction and control shall be equal to that exercised with respect to all other members of the civilian component. [DEOA §419(a)(2)]

(2) Access to facilities. In accordance with interagency agreements, DOD shall provide facilities and access to facilities used by overseas personnel in carrying out their educational duties and shall exercise a level and degree of control over such facilities comparable to that exercised prior to the effective date of the transfer.
[DEOA §419(a)(2)]

VIII. RULES AND REGULATIONS

(1) Applicability of military rules and regulations. All rules and regulations of the military command relevant to the activities of members of the civilian component shall apply to overseas personnel.

(2) Applicability of other DOD rules and regulations. All currently applicable orders, determinations, rules, and regulations, instructions and guidelines which have been issued by DOD or any

agency, official, or officer thereof, which are in effect on the effective date of the transfer and are consistent with this interdepartmental agreement, shall continue in effect and shall apply to overseas personnel, subject to modification by DOD or in the case of DoDDS educational issuances, until reissued as ED issuances.

(3) Enumeration. The documents which apply to overseas personnel under paragraph (2) include but are not limited to the following; as applicable:

(i) DOD directives, instructions and guidelines
(ii) DoDDS directives
(iii) Regional DoDDS directives
(iv) (Others to be listed)

(4) Housing. Whenever an agency of DOD provides housing to overseas personnel, such agency shall continue to possess and exercise where necessary all functions related to the provision of such housing.

[DEOA §419(a)]

IX. RESPONSIBILITIES UNDER STATUS OF FORCES AGREEMENTS

(1) Jurisdiction. DOD shall assume jurisdiction over all matters with respect to overseas personnel conferred upon it under any status of forces agreement.

(2) Assistance to host State in investigations. DOD shall provide assistance to the host State in the investigation of any matter (with respect to personnel) as provided by an applicable status of forces agreement.

(3) Removal. DOD shall arrange for the removal from any host State of any personnel where required and appropriate under any status of forces agreement providing for such removal.

(4) SOFA enforcement. DOD shall carry out its responsibilities for enforcement of any provision of any status of forces agreement respecting such personnel, including the proper use of privileges under such status of forces agreement.

(5) Notification to host country. DOD shall provide all notifications to the host country with respect to overseas personnel as required by any status of forces' agreement.

[DEOA §419(a)]

X. CONTACT ON SOFA MATTERS

The U.S. contact with respect to matters related to the status of forces agreement shall continue to be the appropriate U.S. military command exercising designated commanding officer functions.

[DEOA §419(a)]

XI. EMPLOYEE OBLIGATIONS

(1) General. Overseas personnel shall continue to observe all rules, regulations, requirements, determinations and orders

to which they are now (or will be) subject in their capabilities as members of the civilian component.
[DEOA §§401(f); 419(a)(2)]

(2) Jurisdiction. Such personnel shall respond to the jurisdiction of military authorities with respect to all matters to which such jurisdiction extends.
[DEOA §§401(f), 419(a)(2)]

(3) Observance of SOFA obligations; restrictions on use of benefits. Such personnel shall be responsible to carry out all obligations imposed upon members of the civilian component including obligations regarding the proper use of benefits and privileges.

(4) Observance of rules. Such personnel shall observe all rules of conduct and discipline issued by the designated military command with respect to the conduct of civilian personnel subject to that command.

(5) Directives. Each department, in conjunction with the other, shall issue appropriate communications to overseas personnel regarding the provisions of this agreement for which the issuing department is responsible.
[DEOA §§401(f), 419(a)]

XII. EFFECTUATION OF EDUCATION POLICY

Nothing in this agreement shall preclude ED from carrying out its responsibilities consistent with this interagency agreement with regard to the operation of the overseas dependents educational system.
[DEOA §302]

XIII. REIMBURSEMENT

All services and other support provided by DOD under this interagency agreement shall be reimbursable on the same basis as the services and other support provided to the overseas dependents schools prior to the effective date of the transfer and/or as provided for in other agreements between the two departments developed as part of the overall transfer plan.

APPENDIX I. PROPOSED INTERDEPARTMENTAL AGREEMENT ON PERSONNEL SERVICING

PERSONNEL SERVICING AGREEMENT

BETWEEN

DEPARTMENT OF DEFENSE
AND
DEPARTMENT OF EDUCATION

1. The Department of Defense agrees to provide civilian personnel services overseas as provided below to the Administrator of Education for Overseas Dependents, Department of Education. Such services will be provided in accordance with DOD Directive 1400.16, Interdepartmental Civilian Personnel Administration Support.

2. The employees of the Office of Education for Overseas Dependents (OEOD), Department of Education, stationed outside the United States, shall be considered as members of the civilian component of the armed services. They shall carry Department of Defense identification and shall be entitled to the rights, benefits and privileges of Department of Defense civilian employees of like grade, seniority and position. All Department of Defense regulatory guidance shall be applicable to all OEOD employees stationed outside the United States unless specifically excluded by the Administrator. Consequently, the Department of Defense, or its components, will consult with appropriate levels of OEOD on any proposed changes in personnel policies, procedures, or working conditions which would affect employees of OEOD. The Office of Education for Overseas Dependents will consult with appropriate levels of the Department of Defense, or its components, on any proposed changes in personnel policies, procedures, or working conditions which might impact on servicing provided by the Department of Defense.

3. The Administrator of Education for Overseas Dependents, Department of Education (OEOD) delegated his appointing authority to regional directors who designate the Civilian Personnel Officers of the military departments to "act for" them in the administration of the civilian personnel management program. Regional directors are authorized to designate members of their staffs to "act for,' as may be required by the regulations of the servicing agency. This designation will not be withdrawn without prior notification to the DASD(CPP). This designation includes the authenticity of personnel actions, execution of administrative documents (to include travel orders, passport applications, and allowances) and, as modified below, the administration of the position and pay management, recruitment and placement, employee-management relations, training and development, incentive awards, and other personnel program elements necessary to manage an effective work force. The servicing civilian personnel officer is authorized to designate other members of the civilian personnel office staff to "act for" in these areas. This designation does not reduce

the authority and responsibility of the Regional Director, OEOD, for the effective management and direction of employees under their jurisdiction and for the evaluation of personnel management services provided.

4. The servicing civilian personnel officer will serve as if a member of the staff of the Regional Director, OEOD, and will provide a complete civilian personnel service program which is responsive to the needs of the Regional Director. The Director will be supportive of the operating civilian personnel program goals of those program elements governed by the regulations of the servicing agency.

5. Administration of local national employees will be in accordance with applicable policies, regulations, and procedures of the local servicing activity and applicable laws and practices of the host government., This includes recruitment, promotions, reduction-in-force, incentive awards, training, separation, job evaluation, pay administration, and other program elements necessary to manage an effective local national work force.

6. Administration of the civilian personnel program will be in accordance with DOD Directive 1400.13. Salaries and Personnel Practices Applicable to Teachers and Other Employees of the DOD Overseas Dependents' School System, as applicable, and the policies, regulations, directives, and procedures of OEOD. In those functional areas not addressed by OEOD, the policies, regulations, directives, procedures, and forms of the servicing agency shall apply, except as modified below. In such instances, regulatory references to activity commanders and major commanders shall refer to OEOD lines of command when the issue in question pertains to matters not directly within the responsibility of the military commanders.

a. Career Program. Competitive service employees who have reemployment rights to a military department and who were covered by the department's career program immediately prior to assignment to OEOD may continue registration in the program for competitive referral, while employed overseas with OEOD, under guidance issued jointly by OEOD and the DASD(CPP).

b. Rotation. Requests to extend tours of duty of competitive service employees beyond the periods specified in DOD Instruction 1404.3, Standardized Overseas Tours of Duty for United States Citizen Civilian Employees of the Department of Defense, and in the agreement for overseas employment will be submitted through OEOD channels for decision.

c. Staffing. For purposes of the local merit promotion program, OEOD wage grade and general schedule employees, GS-8 and below, will be included in the area of consideration established for filling local servicing agency vacancies.

d. Reduction-in-Force. OEOD employees will be in competitive areas and levels designated by OEOD, separate from employees of the servicing agency.

e. Equal Employment Opportunity

(1) The OEOD EEO Plan of Action will apply. OEOD will designate an EEO officer, Federal Women's and Hispanic Employment Program coordinators and EEO counselors in each region.

(2) Complainants may choose OEOD or host installation counselors. Complaints not resolved at the local level will be processed through OEOD channels and reported in accordance with subparagraph 6e(3), when the complaint involves matters under the jurisdiction of the OEOD. Complaints involving matters under the jurisdiction of a military department will be processed and reported through the channels of the servicing agency.

(3) Servicing agency counselors and OEOD counselors subject to this agreement will provide the OEOD regional equal employment opportunity officer data necessary to accomplish the reporting requirements prescribed in Appendix C, Chapter 713, FPM.

f. Labor-Management Relations. The servicing agency shall provide technical advice and assistance at the local level and shall serve as principal contact on all labor-management matters involving the local military command. OEOD administrators shall be invited to attend any local labor-management relations training conducted by the servicing agency. Representatives of the servicing agency will be invited to attend OEOD labor-management relations training.

g. Training. Training provided by or through the servicing agency, including supervisory training, shall be made available to OEOD employees on the same basis as to employees of the servicing agency. Applications for such training, when approved and funded by appropriate OEOD regional authority, will be submitted through the channels of the servicing agency. OEOD will provide to the servicing agency data on internal OEOD training for the Annual Report of Training Activities.

h. Incentive Awards. The policies and standards of DOD, as contained in the enclosures to DOD Instruction 5120.16, DOD Incentive Awards Program, and DOD Instruction 1416.4, Quality Step Increases for Employees Subject to the Classification Act of 1949, as amended, shall be applicable to OEOD employees, except that public law employees are ineligible for quality step increases. OEOD certificates and the pins, decorations, and other forms of service and honorary recognition prescribed by the servicing agency will be used.

i. Grievances. Grievances from OEOD employees involving matters within the jurisdiction of OEOD management shall be processed under OEOD procedures. Grievances involving issues under the administrative or legal jurisdiction of the military departments shall be processed and adjudicated under the grievance procedure of the servicing agency, at no cost to OEOD. The grievance procedure of the servicing agency will be utilized only when authority to provide resolution rests with the military department.

j. Performance Ratings. The rating forms and procedures of OEOD will be used.

k. Automated Personnel Information System. The Department of the Army will serve as Executive Agent for the OEOD Automated Personnel Information System. The servicing office will provide necessary personnel data to the Department of the Army in accordance with Department of the Army procedures.

l. Reports. Reports required by the Office of Personnel Management Subchapter 2 of FPM, Chapter 291, shall be prepared and transmitted by the servicing agency in accordance with the procedures of that agency except that:

(1). OEOD employees will be reported separately from employees of the servicing agency.

(2). The Department of the Army Civilian Personnel Information System shall provide to the Administrator, OEOD, the Monthly Report of Federal Civilian Employment (SF 113-A), Monthly Report on Veterans (SF 113-F), Report of Temporary Summer Employment CSC Form 113-D, and related reports.

m. Actions Required Above Local Level. All matters under the authority of OEOD which require action above the local level will be forwarded through OEOD channels.

7. OEOD will assure that all applicable OEOD policies, regulations, directives, and procedures are furnished to the servicing agency. The servicing agency will assure that all necessary regulations and instructions it publishes are furnished to OEOD on a continuing basis.

8. This agreement will be implemented at the servicing installation level by inclusion of Support Category AC, Civilian Personnel Services, in the Support Agreement, DD Form 1144, negotiated between the supporting installation and the appropriate dependents schools officials. Reimbursable costs will be specified therein as provided by DOD 4000.19-M, Defense Retail Interservice Support (DRIS) Manual. Reimbursable costs will be based on a servicing ratio of not richer than 70 OEOD employees per personnel office manager.

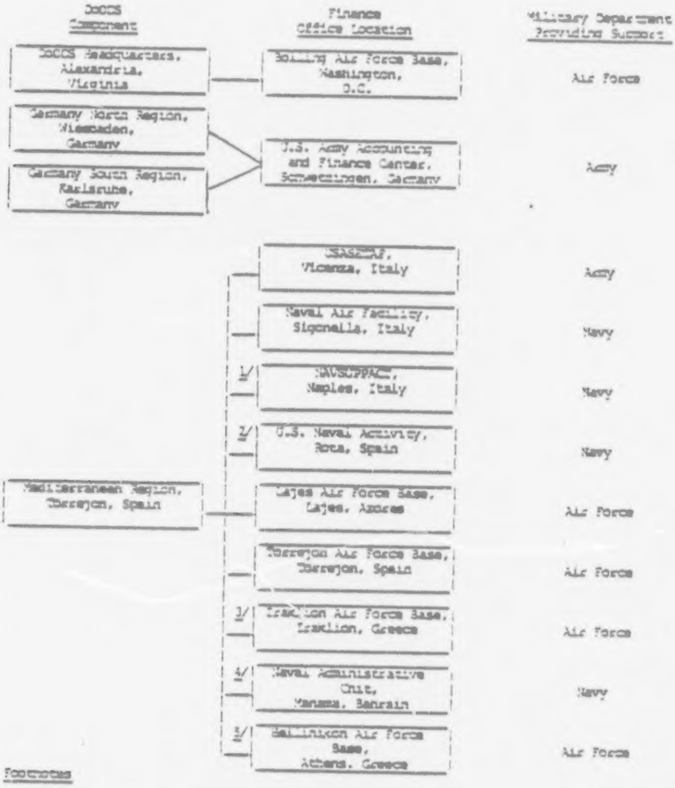
9. The provisions of this agreement shall become effective on the date of the transfer of the overseas schools, or upon signature, whichever is later, and shall remain in effect until superseded or terminated by mutual agreement. It will be reviewed on a periodic basis, at least annually, and updated as necessary.

Upon agreement of the parties to modify the agreement, the Administrator, OEOD, will initiate the action.

APPROVED:

Department of Education	Department of Defense

APPENDIX J. DISTRIBUTION OF FINANCE OFFICES BY GEOGRAPHICAL LOCATION AND MILITARY DEPARTMENT


DoDDS Component
Finance Office Location
Military Department Providing Support
DoDDS Headquarters, Alexandria, Virginia
Bolling Air Force Base, Washington, D.C.
Air Force
Germany North Region, Wiesbaden, Germany
Germany South Region, Karlsruhe, Germany
U.S. Army Accounting and Finance Center, Schwetzingen, Germany
Army
USASETAF, Vicenza, Italy
Army
Naval Air Facility, Sigonella, Italy
Navy
1/
NAVSUPPACT, Naples, Italy
Navy
2/
U.S. Naval Activity, Rota, Spain
Navy
Mediterranean Region, Torrejon, Spain
Lajes Air Force Base, Lajes, Azores
Air Force
Torrejon Air Force Base, Torrejon, Spain
Air Force
3/
Iraklion Air Force Base, Iraklion, Greece
Air Force
4/
Naval Administrative Unit, Manama, Bahrain
Navy
5/
Hellinikon Air Force Base, Athens, Greece
Air Force

Footnotes

1/ Provides all payroll support for Naples, Italy, and La Maddalena, Sardina.

2/ Provides all payroll support for Rota, Spain, and civilian payroll support for Bahrain.

3/ Provides payroll support for Iraklion, Greece, and Crete.

4/ Provides foreign national payroll support for Bahrain.

5/ Provides payroll support for Hellenikon, Greece; Ankara, Incirlik; and Izmir, Turkey.

DISTRIBUTION OF FINANCE OFFICES BY GEOGRAPHICAL LOCATION AND MILITARY DEPARTMENT (continued)

DoDDS Component	Finance Office Location	Military Department Providing Support
Atlantic Region, London, England	U.S. Navy Education and Training Financial Information Processing Center, Pensacola, Florida	Navy
	Naval Activities Station, London, England	Navy
	6/ Navy Personnel Support Activity Detachment, London, England	Navy
	Upper Heyford Air Force Base, Upper Heyford, England	Air Force
	Nato SHAPE Support Group, 22nd Finance Section, Civilian Pay Branch, Casteau, Belgium	Army
	Naval Air Station, Bermuda	Navy
	7/ Fleet Accounting and Disbursement Center, Norfolk, Virginia	Navy
	Naval Air Station, Keflavik, Iceland	Navy
	U.S. Naval Station, Newfoundland, Canada	Navy
	8/ U.S. Army Accounting and Finance Center, Schwetzingen, Germany	Army
	9/ 48th TFW, RAF Lakenheath, England	Air Force
	10/ 7240 ABS Oslo, Norway	Air Force
	11/ 32nd TFS Camp New Amsterdam, Netherlands	Air Force

Footnotes

6/ Provides payroll support for local national direct hires.

7/ Provides payroll support for Cuba (Guantanamo Bay) and the British West Indies (Antigua).

8/ Provides payroll support for DoDDS Atlantic Region ROTC personnel.

9/ Provides payroll support for local national indirect hires.

10/ Provides payroll support for local national direct hires.

11/ Provides payroll support for local national indirect hires.

DISTRIBUTION OF FINANCE OFFICES BY GEOGRAPHICAL LOCATION AND MILITARY DEPARTMENT (continued)

DoDDS Component	Finance Office Location	Military Department Providing Support
Pacific Region, Okinawa, Japan [12/]	Kadena Air Force Base, Okinawa, Japan	Air Force
	Clark Air Force Base, The Philippines	Air Force
	Yokota Air Force Base, Yokota, Japan	Air Force
	U.S. 8th Army Accounting and Finance Office, Osan, Korea	Army
Panama Region, Panama	Howard Air Force Base, Panama	Air Force

Footnotes

12/ Provides payroll support for all DoDDS employees in Japan and Korea except for foreign national employees in Korea.

APPENDIX K. PROPOSED INTERAGENCY AGREEMENT ON FINANCIAL SUPPORT SERVICES

1. The Assistant Secretary of Defense (Comptroller) and the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics agree to provide, in accordance with current servicing agreements and established practices, financial support services, including payroll and accounting support, to the dependents education system in manner and degree to that provided prior to the effective date of the proposed transfer of functions specified in section 302 of Public Law 96-88.
2. This interagency agreement governs the provision of all financial support services, reimbursable and nonreimbursable, by DOD components to the dependents education system.
3. All reimbursements for reimbursable financial support services provided under this agreement shall be only those identifiable net additional costs incurred by DOD components providing these services. Those costs that are not identifiable net additional costs will be nonreimbursable.
4. All reimbursements for financial support services provided under this agreement will be governed by the current criteria prescribed in the following DOD and military department directives, manuals, and instructions:
   - o DOD Directive 1342.6, "Department of Defense Dependents Schools"
   - o DOD Manual 1342.6-M-1, "Administrative and Logistic Responsibilities for DOD Dependents Schools"

- DOD Directive 4000.19, "Basic Policies and Principles for Interservice, Interdepartmental, and Interagency Support"
- DOD Manual 4000.19-M, "Defense Retail Interservice Support (DRIS) Manual"
- Joint Army, Navy, and Air Force Instructions, "Basic Policies and Principles for Interservice, Interdepartmental, and Interagency Support"
- Joint Army, Navy, and Air Force Instructions, "Financial Administration of Interservice and Interdepartmental Support Agreements"

5. The Administrator of Education for Overseas Dependents agrees to fund the costs of all reimbursable financial support services, including the cost of all reimbursable financial support services specified in interservice support agreements, from funds appropriated by the Congress to the Education Department for the administration and operation of the dependents education system.
6. The Inspector General, Department of Education, will assume prime responsibility for audit-related functions regarding the dependents education system.
7. The Director of the Defense Audit Service and the Auditors General of the Army Audit Agency, Naval Audit Service, and the Air Force Audit Agency agree to coordinate, whenever practicable, single location audits and reviews of military installations where dependents schools are located and multilocation audits of support functions that directly concern dependents schools, with the Inspector General, Department of Education.

8. The provisions of this agreement shall become effective on the effective date of the proposed transfer of functions specified in section 302 of Public Law 96-88, and shall remain effective until superseded or terminated by mutual agreement. The agreement will be reviewed on a periodic basis, at least annually, and updated as necessary.

Department of Defense		Department of Education	
Assistant Secretary of Defense (Comptroller)	Date	Administrator of Education for Overseas Dependents	Date
Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics	Date	Inspector General	Date
Director, Defense Audit Service	Date		
Auditor General, U.S. Army Audit Agency	Date		
Auditor General, Naval Audit Service	Date		
Auditor General, U.S. Air Force Audit Agency	Date		

APPENDIX L. ESTIMATED FY 1982 COSTS AND MILITARY DEPARTMENT STAFF REQUIREMENTS FOR REIMBURSABLE SUPPORT SERVICES PROVIDED TO DoDDS UNDER INTERSERVICE SUPPORT AGREEMENTS

Support Category	Cost	Staff Requirements
Transportation	$37,122,200	489.1
Utilities	21,358,300	43.8
Maintenance & Repair	17,673,400	215.6
Custodial Services	14,526,100	151
Engineering Support	6,530,000	(1)
Real Property Rental	5,099,700	6
Vehicles Commercial and Military	3,740,800	128.5
Civilian Personnel Services	3,622,400	130.8
Petroleum, Oil and Lubricants	2,266,000	(1)
Accounting and Finance	1,427,700	63.3
Housing and Office Equipment	1,058,400	15.2
Communication Services	726,700	.1
Other Costs	488,000	26.9
Food Service	428,500	(1)
Printing and Reproduction	301,600	.1
Computer and Data Processing	158,400	2.1
Laundry and Dry Cleaning	64,200	1.1
Administrative Services	1,600	.1
TOTAL	$117,584,000	1,274

(1) No personnel identified

APPENDIX M. CATEGORIES OF NONREIMBURSABLE SUPPORT SERVICES

1. Legal services and claims.
2. Military labor.
3. Student-related medical services and expendable supplies provided to the dependents schools.
4. Medical/dental services and supplies rendered to students in school.
5. Family housing (DOD-controlled).
6. Mail pickup and delivery.
7. Fire protection.
8. Chaplain (except contract chaplain and TDY costs).
9. Noncombatant evacuation orders.
10. Off-duty education services.
11. Law enforcement/police protection.
12. Recreation services (less payment of sports officials).
13. Public information (American Forces Radio and Television Service).
14. Inspector General services.
15. Community support functions, such as bowling alleys, libraries, recreation centers, etc.
16. Housing referral service.
17. Commissary and food service support.
18. Transportation via military scheduled shuttle bus.
19. Nonappropriated fund activities.
    a. Exchange and motion picture services.
    b. Class VI.
    c. Officer/NCO club service.
    d. Audio/photo clubs.

20. Communications service (common user).

    a. Military telecommunications (Class A/C telephone, local and long distance calls, communications center).

    b. Programmed lease and military long distant lines.

21. Records administration.

22. Explosive ordinance disposal.

23. Search and rescue.

24. Traffic management assistance.

25. Open storage space, real property.

26. Veterinarian services.

27. Bachelor Officers Quarters (BOQ).

28. Transportation standby or dead time.

29. Costs of schools officers.

30. Processing of agency investigations and personnel security clearances.

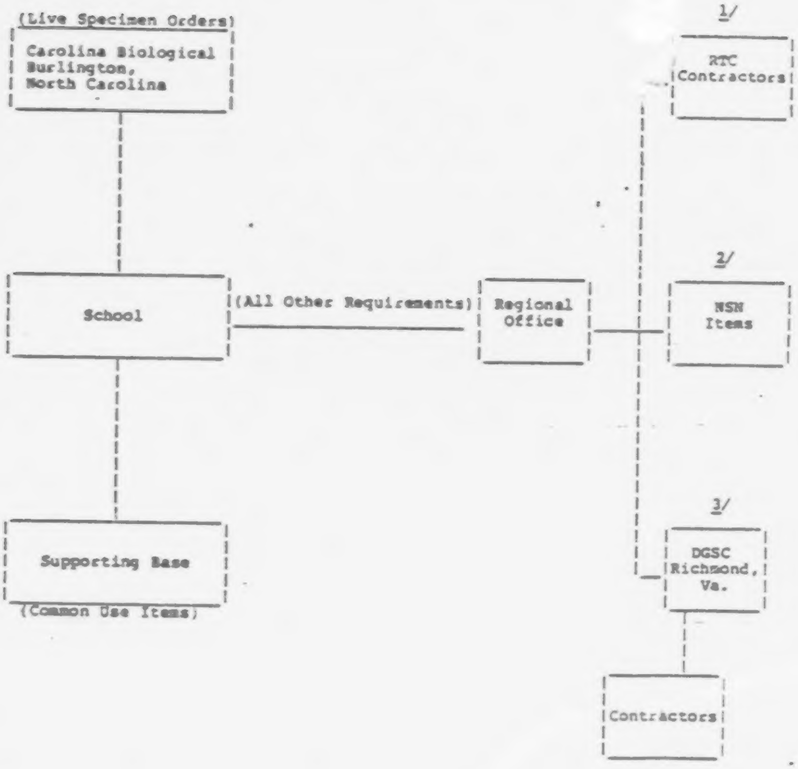
31. Publications and forms supply and services.

32. Traffic management office services.

33. Mortuary services, unless reimbursement is required/authorized in pertinent military department regulations.

34. Aeromedical evacuation.

APPENDIX N. DoDDS PROCUREMENT PROCEDURES


(Live Specimen Orders)
Carolina Biological
Burlington,
North Carolina
1/
RTC
Contractors
School
(All Other Requirements)
Regional
Office
2/
NSN
Items
3/
DGSC
Richmond,
Va.
Supporting Base
(Common Use Items)
Contractors

1/ Requirements Types Contracts (RTC's)

2/ National Stock Number (NSN) Items

3/ Defense General Supply Center (DGSC) - All Non-RTC Orders

APPENDIX O. PROPOSED INTERAGENCY LOGISTICAL SUPPORT AGREEMENT

1. The Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics agrees to provide, in accordance with current servicing agreements and established practices, administrative and logistical support services to the dependents education system in manner and degree to that provided prior to the effective date of the proposed transfer of functions specified in section 302 of Public Law 96-88.
2. This interagency support agreement governs the provision of all administrative and logistical support services, reimbursable and nonreimbursable by DOD components to the dependents education system.
3. All reimbursements for reimbursable administrative and logistical support services provided under this agreement shall be only those identifiable net additional costs incurred by DOD components providing these services. Those costs that are not identifiable net additional costs will be non-reimbursable.
4. All reimbursements for administrative and logistical support services provided under this agreement will be governed by the current criteria prescribed in the following DOD and military department directives, manuals and instructions:

- DOD Directive 1342.6, "Department of Defense Dependents Schools"
- DOD Manual 1342.6-M-1, "Administrative and Logistic Responsibilities for DOD Dependents Schools"
- DOD Directive 4000.19, "Basic Policies and Principles for Interservice, Interdepartmental, and Interagency Support"
- DOD Manual 4000.19-M, "Defense Retail Interservice Support (DRIS) Manual"
- Joint Army, Navy, and Air Force Instructions, "Basic Policies and Principles for Interservice, Interdepartmental, and Interagency Support"
- Joint Army, Navy, and Air Force Instructions, "Financial Administration of Interservice and Interdepartmental Support Agreements"

5. The Administrator of Education for Overseas Dependents agrees to fund the costs of all reimbursable administrative and logistical support services, including the cost of all reimbursable support services specified in interservice support agreements, from funds appropriated by the Congress to the Education Department for the administration and operation of the dependents education system.

6. The provisions of this agreement shall become effective on the effective date of the proposed transfer of functions specified in section 302 of Public Law 96-88, and shall remain effective until superseded or terminated by mutual agreement. The agreement will be reviewed on a periodic basis, at least annually, and updated as necessary.

Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics	Administrator of Education for Overseas Dependents
Date	Date

nea

GOVERNMENT RELATIONS

NATIONAL EDUCATION ASSOCIATION • 1201 16th St., N.W., Washington, D.C. 20036 • (202) 833-5411
WILLARD H. McGUIRE, President
BERNIE FREITAG, Vice President
MARY HATWOOD FUTRELL, Secretary-Treasurer
TERRY HERNDON, Executive Director

October 26, 1981

FROM: National Education Association
Bob Canavan, LaMar Haynes

RE: Analysis of the Transfer Plan of the Overseas Schools for Military Dependents (DoDDS) to the Department of Education (ED) from the Department of Defense (DOD)

Attached is an analysis of the Transfer Plan of DoDDS to ED from DOD.

As a result of our analysis of the Transfer Plan, we find serious deficiencies and problems in DoDDS which hamper the achievement of quality education. Based upon our review of ED resources, as well as the administrative record of DoDDS, it is clear that to achieve this goal, it is imperative that DoDDS be transferred to ED consistent with the mandates of Public Law 96-88 (The Department of Education Organization Act) and Public Law 95-561 (The Dependents' Education Act of 1978).

Critical educational issues have been identified in all major phases of the DoDDS system as described in the Transfer Plan. We have highlighted certain areas which demand special attention.

It should be noted that the Transfer Plan entitled Report to the Congress: A Plan for the Transfer of the Overseas Schools for Military Dependents to the Department of Education from the Defense Department prepared by the U.S. Department of Education and dated May 4, 1981 is the primary source for this analysis.

An Analysis of the Transfer Plan of the Overseas Schools for Military Dependents (DoDDS) to the Department of Education (ED) from the Department of Defense (DOD)

Introduction

Section 302 of the Department of Education Organization Act (Public Law 96-88) requires the Secretary of Education to submit to the Congress a plan for effecting the transfer and administration of all functions of the Secretary of Defense and DOD with respect to the operation of the overseas schools for dependents of DOD, including those functions initially given to the Secretary of Defense and DOD under the Defense Dependents' Education Act of 1978 (Title XIV of Public Law 95-561). Additionally, Section 302(C) of Public Law 96-88 requires that the Transfer Plan include "recommendations for increasing the participation of parents, teachers, students, school administrators, and members of the Armed Forces in the administration and operations of the schools transferred."

In general, the Transfer Plan includes (1) arrangements for transfer, (2) a description of the various functions of the schools and an analysis and a list of requirements for effectively administering them, and (3) recommendations for increasing participation of the members of the overseas community.

The Transfer Plan includes seven major sections which relate to the substantive areas of DoDDS with regard to the transfer to ED and DOD. These areas are as follows:

I. Toward Increasing School Community Participation

II. Education Programs and Services

III. Personnel Management

IV. Financial Management

V. Logistical Support Services

VI. Organization and Management

VII. The Panama Canal College.

A summary and an analysis of the findings and recommendations in the Transfer Plan are included below.

Summary and Analysis of Findings

Toward Increasing School Community Participation

Advisory Council on Dependents Education

Section 1411(a) of Public Law 95-561, as amended by Public Law 96-88, provides for the establishment of the Advisory Council on Dependents Education (ACDE) which is to be composed of the following: (1) the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics (Co-chairman), (2) the Administrator of Education for Overseas Dependents (Co-chairman), (3) twelve individuals in primary or secondary education including representatives of professional employee organizations, school administrators, parents of dependents, and one student enrolled in the dependents' education system (appointed by the Secretary of Education), and (4) a representative of the Secretary of Education and of the Secretary of Defense. Members are appointed.

The ACDE is required to meet four times a year and is responsible for performing the following functions: (1) recommend general policies for operation of the defense dependent's education system with respect to curriculum selection, administration, and operation of the system, (2) make recommendations concerning the orderly transfer of the functions under Public Law 95-561, (3) provide information from other Federal agencies concerned with primary and secondary education with respect to education programs and practices which should be included in the defense dependents' education system, (4) advise on the design and the selection of the contractor for the study of the defense dependents' education system required under Section 1412(a) of P.L. 95-561, and (5) perform other tasks as may be required by the Secretary of Education.

The Secretary of Education received nominations for twelve individual appointments to the ACDE from appropriate organizations and constituencies with an interest in the dependent schools.

Local Advisory Committees

Section 1410(a)(1) of Public Law 95-561 requires the establishment of an advisory committee for each school in the defense dependents' education system. These local advisory committees are responsible for advising the principal or superintendent of the school with respect to the operation of the school, making recommendations with respect to curriculum and budget matters, and advising the local military commander with respect to problems concerning dependents' education within the jurisdiction of the commander when there is more than one school in an installation. Members of a school advisory committee are to include an equal number of parents of students enrolled in the school and of employees working at the school, and when appropriate, may include a student enrolled in the school. The members of local advisory committees are directly elected.

Overseas Dependents Schools National Advisory Panel

Sections 1402 (6)(2)(A) and 1409(c) of Public Law 95-561 requires the establishment of an advisory panel to assure the provision of programs designed to meet the special needs of the handicapped and compliance with the provisions of the Education for All Handicapped Children Act of 1975 (Public Law 94-142). The following groups must be represented on the panel: (1) handicapped individuals, (2) teachers of handicapped children, (3) parents of handicapped children, (4) Office of Dependent Schools and regional educational officials, and (5) special education program administrators.
on the panel.

Education Programs and Services

Student Population

A total of 135,624 students were enrolled in DoDDS in 1980-81.

Currently, about 94 percent of the students enrolled in DoDDS schools are military dependents.

The profile of DoDDS students is fairly representative of the extended middle portion of students who attend public schools in the United States. Few if any of the very rich or very poor are found in DoDDS schools. Mainly military dependents, DoDDS students are very mobile and therefore rarely attend the same school for more than three consecutive years. Students' aptitudes are high and, on the average, DoDDS students perform at least as well or better than their counterparts in public schools in the United States.

An exact racial/ethnic profile of DoDDS students is not presently available, because this information is not collected routinely by the school system. However, their profile would be similar to that of the armed services in those overseas communities in which DoDDS schools are located and is about two-thirds white and one-third minority.

The proportion of minority members of the armed services has risen steadily in recent years. For the years 1976, 1978, and 1980, for example, the proportion of total military personnel--overseas and in the United States--who were minorities was 22 percent, 25 percent, and 28 percent, respectively. Data on current armed services accessions suggest that in the 1980's the proportion of minority members in the services will continue to be at least one to three.

Instructional Planning

The central aim of the DoDDS system is to provide a quality education for all children attending its overseas dependents schools.

DoDDS developed a Five-Year Curriculum Development Plan which was instituted under a review cycle for school years 1974-75 through 1979-80. The current cycle covers 1980-81 through 1984-85. It attempts to provide general procedures for curricular decision-making for the entire school system, while preserving some freedom of choice to those who are actively engaged in teaching at each local school.

The five-year cycle contains five components for each year in the instructional review process. These five components are (1) formulation of instructional objectives, (2) identification of instructional (procedural) alternatives, (3) selection of instructional (procedural) materials, (4) conduct of inservice education, and (5) evaluation. Each year three of the 15 educational programs enter the cycle, so that they are staggered throughout its five stages.

The Curriculum Development Plan is the responsibility of the DoDDS Curriculum Development Committee, which consists of the chief of the Education Division in each of the six regions and the chief of the Education Division and of the curriculum and evaluation branches in the central Office of Dependents Schools (ODS). The committee is chaired by the chief of the ODS Education Division. A task group is also set up for each education program as it enters the cycle. Each task group consists of the coordinator for the education program in each of the six regions and in ODS, with the coordinator from ODS chairing the group. There is also a special task group on evaluation, consisting of the chiefs of the evaluation branch in each region and in ODS.

Each task group performs the activities or tasks specified for all components in its education program and makes recommendations to the DoDDS Curriculum Development Committee for review. The committee then coordinates with ODS Logistics, Fiscal, and Personnel Division Chiefs as appropriate, finally making recommendations to the Director of DoDDS. Upon approval by the Director, a recommendation becomes policy.

Two weaknesses in the present 5-year curriculum review process are that (1) local schools as a group do not participate sufficiently in the process and (2) curriculum review decisions are not necessarily given the budgetary and logistical support required to ensure their implementation.

Accreditation

In school year 1980-81, the DoDDS school system consisted of 270 schools located in 20 countries.

DoDDS schools are accredited by the North Central Association of Colleges and Schools (NCA) which is concerned primarily with the implementation of a comprehensive education program, pupil-teacher ratios, school facilities, school supplies, administrative services, and teacher qualifications.

Of the 270 schools in DoDDS, 105 have been evaluated and accredited by NCA. Twenty additional accreditations are underway, and it is expected that by spring 1982 all DoDDS schools with an enrollment of 150 students or more will have been accredited by NCA. DoDDS expects that by the close of the 1984-85 school year, all schools will have been accredited (except those with very small enrollments).

The greatest number of deficiencies cited by NCA concern personnel credentials.

Note: It is our understanding that a number of the deficiencies in personnel credentials result from the DoDDS requirement that dependent spouses be hired.

Other deficiencies cited by NCA include the following: (1) incomplete reporting and documenting of personnel credentials; (2) lack of continuity of instruction and curriculum implementation across grade levels, from school to school, and between elementary and secondary levels; (3) shortage of inservice education activities; (4) insufficient financial and staffing support for the media program; (5) need for increased ongoing administrative training for school principals; (6) lack of administrative support for high school work/study programs; (7) insufficient staff and programs in ESL to meet the needs of students with limited ability in English; and (8) program deficiencies in the area of education for the handicapped and for the gifted/talented caused by personnel shortages.

Administration

The organizational arrangement in DoDDS headquarters corresponds closely to that of the education programs and services themselves. The Education Division, administered by a division chief, is responsible for all education programs and services. The division is divided into branches, each headed by a branch chief who is responsible for curriculum, supplementary education, and evaluation, respectively. The curriculum branch has a program coordinator for virtually each subject area: Arts and humanities, career education, foreign language/intercultural education, host nation, health/physical education, language arts, mathematics, reading, science, and social studies. Likewise, there are coordinators in the supplementary education branch for accreditation, compensatory education, computer education, educational media, pupil personnel services, and special education. The evaluation branch consists of a branch chief and three coordinators who are concerned with basic skills assessment, program evaluation, and research and improvement activities. Each of the six regions also has an education division with an organizational structure identical to that of the DoDDS central office. Through a cooperative system and working through the Five-Year Curriculum Development Plan, these coordinators and their branch chiefs effect the decisions concerning the various subject areas that have been made by the DoDDS Curriculum Development Committee through a process described earlier.

There is need for a clear definition of the authority and responsibilities given to roles at the various levels in the administrative hierarchy. Specifically, there is a lack of clarity in the degree and line of authority.

Overview of Programs and Services

Education programs and services as well as graduation requirements in DoDDS schools closely resemble those in most other U.S. public schools. At least 18 units of credit are needed to graduate from grade 12, of which 12-1/2 must be in required fields. A substitution of 1/2 unit of a specific minority studies course may be made for a required 1/2 unit in language arts, arts and humanities, or social studies (except for the required units in U.S. history and government). As in the States, the number of electives offered in a particular school is dependent on the size of the school.

Language arts	4
Social studies (to include 1 in U.S. history and 1/2 in U.S. government)	3
Mathematics	1
Science	1
Career education	1
Arts and humanities	1
Physical education	1
Health education	1/2

The basic curriculum consists of the following programs:

- Arts and humanities
- Career education
- Foreign language/intercultural education
- Health and physical education
- Language arts
- Mathematics
- Reading
- Science
- Social studies

Supplementary programs and services include the following:

Computer education
Educational media
Extracurricular programs
Host nation program
Inservice education
Pupil personnel services
Research, improvement,
  and evaluation

Other special programs which are offered as required under Section 1402(6)(2), Title XIV, Public Law 95-561 include the following:

Compensatory education
Education for the gifted/talented
Education for the handicapped
Education for individuals of limited
  English-speaking ability
Vocational education

Two more programs are under consideration--developmental preschool education and adult education. The former is required by section 1402(b)(3) if it is not otherwise available and if there are funds for it. The latter, adult education, was offered in dependents overseas schools from 1971 through 1975 and was examined by the transition team as a possible addition to DoDDS education programs.

Some of the problems in the basic curriculum include the following:

Arts and Humanities - need for increased staffing, particularly at the elementary level and in isolated schools

Foreign Language/ Intercultural Education - a number of curriculum materials are outdated

Health/Physical Education - staffing level seems significantly below school requirements

Language Arts - adequate inservice education particularly for new teachers is needed

Reading - more reading improvement teachers and specialists are needed

Science - decrease in program quality due to need for replacing expendable items, teachers are not adequately prepared to teach science, and principals have not been able to monitor the teaching of science

Social Studies - need for inservice training for teachers to help them use existing materials and to learn new teaching techniques.

Some of the problems in the supplementary programs and services include the following:

Computer Education - a full computer education program is not presently in operation

Educational Media - cutbacks in planned staffing, equipment, and inservice training; coordinators and school-based media specialists are not current with trends, technology, and research in media field; staffing is insufficient in several regional offices; procurement processes for media center materials are often unsatisfactory; DoDDS has not applied for available library and program support funds under the Elementary and Secondary Education Act (ESEA), Title IV.

Extracurricular activities - lack of after-school activities and a full range of extracurricular activities in a number of overseas schools.

Host Nation Program - no priority in providing suitable opportunities for students to benefit from the extraordinary potential of being in a school system located in other countries.

Inservice Education - need for inservice education for teachers, particularly in the education for the handicapped and other special programs under Public Law 95-561, Title XIV.

Pupil Personnel Services - number of psychologists and social workers presently on board is not adequate to meet the need of the school system, particularly in providing diagnostic services for children requiring special education.

Research, Improvement, and Evaluation - need to provide external support analogous to that found in the United States.

Some of the problems in the special programs include the following:

*Compensatory Education - lack of specific parent participation at the local and national levels; individualized education plans for students are not a regular component of the compensatory education program; an evaluation of program development

* Compensatory Education

Early estimates suggest 23% of the students in grades 1 and 2 needed it, compared to 17% of the children in the United States. Only 23% of the children estimated to need compensatory education will receive it in 1981-82.

has not been conducted; and there is no specific complaint procedure for resolution of complaints by parents, teachers and others.

*Education for the Gifted/Talented - DoDDS does not have accurate data on the number of gifted/talented students or on the number being served; definition of "service" varies from region to region; the ratio of teachers for schools is below minimal needs and the distribution of its minimal services is inconsistent with the population distribution.

*Education for the Handicapped - DoDDS' written guidance does not detail the population to be served or the resources required or programmed, nor does it provide a system of internal monitoring procedures (identification, location, and evaluation of all handicapped children); lack of effective promotion of procedures, parental attendance at Individualized Education Program (IEP) meetings, and data on DoDDS implementation or the effectiveness of the procedures (IEP); related services listed in the IEP may reflect only services that are available; there is no systematic plan of personnel development, nor is a wide variety of training available comparable to that found in the United States; there is no comprehensive set of policies and regulations concerning private school tuition reimbursement for handicapped children; there are no extensive procedural safeguards available to parents within the DoDDS system (hearing procedures are pending).

Note: It is our understanding that DoDDS does not adequately fund Education for the Handicapped programs because the DoDDS do not qualify for Handicapped Education and Compensatory Education funds available through the Department of Education.

- Education for the Gifted/Talented

Only a weak program exists for gifted and talented youngsters. Four percent of the students probably need the program, yet only nine teachers now contribute some of their time to these students — a 272 to 1 pupil-teacher ratio. United States standards suggest a minimum program should have a 100 to 1 ratio.

- Education for the Handicapped

DOD does not really monitor what kinds of programs are offered to the estimated 10% of the system's children that need special education-related services.

* Education for Individuals of Limited English-Speaking (LES) Ability - there is no systemwide plan for the DoDDS program for LES students; individual schools organize programs at their own discretion or, in some cases, regional offices provide some direction.

* Vocational/Career Education - DoDDS collects data on the number of enrollments, as opposed to the number of students, in each vocational/career education course, which makes it impossible to determine exactly whether DoDDS has kept pace with average trends in stateside schools; there are ongoing needs for inservice for teachers; there is a need for clear programmatic budget policies and procedures to ensure that inservice monies are earmarked and subsequently expended on inservice needs. *

see p 10 A

Personnel Management

The total staffing for DoDDS is 10,904. There are four major categories of authorized positions which include the following:

1.	General Schedule Employees	- 1,759
2.	Public Law 86-91 Employees	- 7,899
3.	Junior ROTC Instructors	- 30
4.	Foreign Nationals	- 1,216

Personnel management in DoDDS is highly decentralized and relies on military civilian personnel offices in the United States and overseas for support.

No comprehensive system now exists in DoDDS to collect accurate and comprehensive data on students or personnel at regular intervals.

DOD policy requires that priority consideration for teaching positions filled locally be given to dependent spouses of military or civilian personnel employed by a DOD agency. Recruitment of teachers in the United States has slowed somewhat in recent years and currently averages between 400 and 600 employees each year. An average of about 1,200 vacancies were filled annually for teaching and support positions over the past 5 years.

Selection of school personnel varies greatly depending upon whether the personnel are being transferred, hired locally, or recruited from the United States. There is no centralized authority for selection of school personnel.

- Education for Individuals of Limited English-Speaking (LES) Ability

  Six percent of the students are limited in their ability to speak English. No data exists on the number of staff who are helping these students, but probably only 20 teachers out of a need of 320 are involved in these programs.

- Vocational/Career Education

  One out of every seven teachers in automotive technology, cosmetology, electricity and electronics are deficient in fundamental teaching skills.

- No pre-school programs exist for children of American dependents overseas. Only some limited child-care programs exist but these programs offer no developmental or educational components. An internal 1980 DOD study recommended that a program be created but no action has yet been taken. The report observed: "Children below kindergarden age in overseas military families are somewhat disadvantaged compared to their counterparts in the United States both in the small number of pre-school programs available and in the uneven quality of those that are available."

Personnel at the regional level and individual school principals are selected by the regional director, unless their grade is at the GS-14 level or above, in which case ODS approval is required.

All school personnel are evaluated annually. School-level teaching and support personnel are evaluated by the school principal based on periodic observation of their performance of teaching and administrative duties.

In DoDDS, career development focuses primarily on principals, teachers, and education program specialists.

DoDDS has an equal employment opportunity (EEO) program at the headquarters level and in each region. Women constitute about two-thirds of the U.S. nationals employed by DoDDS. The majority of professional educators are women. Employees of racial/ethnic minority backgrounds accounted for about 8 percent of the U.S. employees in 1980. Approximately, 11 percent of the supervisory/management positions in DoDDS are now filled with women and/or minorities.

About 68 percent of the professional educators in DoDDS are active members of professional employee organizations. They are represented by three organizations: The Overseas Education Association (OEA), The Overseas Federation of Teachers, and the American Federation of Teachers (Panama). The largest professional employee organization is OEA which represents teachers in over 80 percent of the schools and has exclusive bargaining authority.

Salary scales are not subject to negotiation. Conditions of employment are covered.

The work force planning system is inadequate. There is a lack of a comprehensive data system.

The quality of personnel services provided by DoDDS is poor. There are many complaints concerning the personnel authority for employment of teachers (Public Law 86-91 - "Defense Department Overseas Teachers" Pay and Personnel Practices Act"), the teacher pay schedule, appointment of teachers, method of employment, the personnel operation and the payroll system, and personnel turnover.

There are major problems regarding late arrivals of teachers, last-minute changes in teacher assignments, and shortages of teachers for some subject areas.

The general perception of many people in the DoDDS system is that the opportunities for advancement and transfer are less than they were previously. Also, many teachers are dissatisfied with the teacher transfer program. They complain that there are not enough opportunities for transfer and that they become locked into one location. Administrators complain that the transfer program is too cumbersome and time-consuming and interferes with the recruitment process.

The transfer program is also costly. DoDDS estimates that it costs an average of $5.000 to move a teacher from one duty station to another. In general, there is a lack of mobility.

Financial Management

The overall responsibility for the budget and financial management of DoDDS rests with the Fiscal Division of the school system's central office, ODS in Alexandria, Virginia. The management of funds, property, and other assets by the ODS Fiscal Division is supported by counterpart fiscal divisions located in each of six overseas regional offices.

The ODS Fiscal Division formulates the DoDDS budget, develops and monitors operating budget plans for the regions, reviews accounting operations, and overseas fiscal reporting requirements. Regional office fiscal divisions develop budget estimates for their respective regions, administer operating budget plans, issue and monitor budget plans for individual schools, and maintain accounting records under policies and procedures promulgated by the central office.

The DoDDS budget includes funds from three separate DOD appropriations: Operations and Maintenance (O&M), Military Construction (MILCON) and Procurement. The DoDDS budget request is jointly reviewed by the Office of the Secretary of Defense (OSD) and the Office of Management and Budget (OMB) and then submitted to the Congress as part of the total DOD budget request for each of the three appropriations. The Congress appropriates DoDDS funds within the three separate DOD appropriations.

DoDDS has a budget of approximately $450 million. In FY 1981, the total estimated cost of operating DoDDS, including construction and procurement activities, was $414 million.

The DoDDS central and regional office fiscal divisions are not adequately staffed to perform the wide range of budget and financial management functions associated with operating a large, geographically dispersed school system.

In the ODS Fiscal Division, only two staff are currently assigned to the budget ($450 million), preparing departmental and Congressional budget justifications, and monitoring the execution of regional office operating budget plans. Only one staff member is currently assigned to the management branch that is responsible for developing cost analyses for program planning. There are no ODS staff specifically assigned to monitor the DoDDS $35 million tuition-collection program.

At the school level, principals are responsible for developing individual school budget estimates, monitoring expense authorization documents, collecting tuition fees, and reviewing interservice support agreement costs. Traditionally, principals have not been trained as financial managers, and the school system does not employ business managers, staff positions common in most other U.S. schools, to assist principals in performing these activities.

There are significant differences in the methodologies employed by the six DoDDS regions to compute budget estimates. Regional office budget data show that estimated funding requirements for specific categories of expenditures vary substantially from region to region and that the estimates are often highly disproportionate to the number of schools and students in each region.

DoDDS has not developed a specific budget allotment formula, as required by Public Law 95-561, Title XIV, Section 1409, for determining the minimum funding necessary for operating each school in the system. The absence of an allotment formula restricts opportunities for estimating resource requirements and distributing DoDDS funds on an equitable basis.

The format of the DoDDS budget is an additional limitation in determining the appropriate level of funding and personnel necessary for operating each school in the system. The current budget format is structured by functional categories of expenditures (e.g., teacher salaries, textbooks) and does not identify specific educational program and staffing costs.

The complete cost of the school system's operation has never been included in its budget or reported elsewhere.

Logistical Support Services

The DoDDS relies totally on the military departments and other DOD components for logistical support services. These services include the following: (1) procurement of educational materials, (2) transportation of students, personnel, and cargo, (3) construction and maintenance of school facilities, and (4) personnel support and financial services. These services are generally provided to DoDDS by DOD components on a reimbursable basis.

The overall responsibility for coordinating and monitoring DoDDS logistical support services rests with the ODS Logistics Division which is supported by counterpart logistics divisions in each of the DoDDS' six overseas regional offices. The ODS Logistics Division has three branches (supply and services, facilities, and transportation and student feeding) and an authorized staff of 13 employees. There are 71 authorized positions to staff the logistics divisions in the six regional offices.

Each school in the DoDDS system receives reimbursable logistical support services from the military department or other DOD agency that is the dominant servicing component in the area where the school is located. These services are provided in accordance with provisions stipulated in interservice support agreements negotiated between each school or school complex and its dominant servicing component.

The ODS Logistics Division estimates that the cost of funding major reimbursable logistical support requirements identified in interservice support agreements for FY 1982 will be $117.6 million and that 1,274 staff positions in the military departments will be required to provide these services. Interservice support agreements do not provide ODS with a reliable index for determining and controlling the actual cost of reimbursable support services. Additionally, there is no complete inventory of interservice support agreements readily available to facilitate ODS management control over the cost of support services.

Each school in the DoDDS system identifies its annual educational material requirements. Schools request funding for six major categories of educational materials which include the following: (1) textbooks, (2) library books, (3) instructional materials, (4) audiovisual materials, (5) supplies, and (6) educational equipment. Most educational materials are purchased in the United States. The DoDDS FY 1982 budget request includes $10.8 million for educational materials. There are problems with the quantity and quality of educational materials, excessive costs, and delivery schedules.

Note: It is our understanding that the delivery process for educational materials is cumbersome and time consuming with considerable time lags before delivery actually reaches the school.

DoDDS ensures that transportation is available to bus students to and from the system's individual schools. DoDDS has no in-house transportation capability and relies totally on the dominant servicing components to furnish bus transportation on a reimbursable basis. Arrangements for bus transportation are detailed in interservice support agreements.

The cost of busing comprises the largest percentage of the annual DoDDS operations and maintenance budget except for salaries. The ODS Logistics Division estimates that the cost of providing bus transportation in FY 1982, based on ODS interservice support agreement data, will be $37.1 million and that 489 military department personnel, in addition to locally hired and contract service bus drivers, will be required to provide this service. A comparative cost analysis of in-house and commercial school busing services has not been completed to determine the most efficient and cost-effective means of transporting DoDDS students.

Public Law 95-561, Title XIV, Section 1406 requires the President to include in his budget for each fiscal year a separate request for funds for construction of DoDDS facilities. The Congress authorizes school construction projects and appropriates funds for construction of DoDDS facilities.

Many facilities in the DoDDS system are substandard. In recent years, DOD has been criticized for this situation by the Congress and NCA which accredits these schools.

Currently, there are no breakfast programs in dependents' schools, except in DoDDS dormitory schools. Additionally, there appears to be little interest in implementing them. A 1979 Logistics Management Institute (LMI) study found that 28 percent of the schools (74 schools) in the DoDDS system had cafeteria equipment and facilities in place and were operating lunch programs. Another 14 percent of the schools (37 schools) had cafeteria equipment and facilities in place but were not operating lunch programs. The remaining 58 percent of the schools (152 schools) had no cafeteria equipment and facilities to operate lunch programs. The majority of dependents' schools operating lunch programs do not participate fully in the USDA-sponsored program. Less than 50 percent of the schools use USDA surplus agricultural commodities and less than 10 percent of the schools request USDA cash subsidies for meals served. While a comprehensive needs analysis has not been conducted, the 1979 LMI study estimated that the FY 1979 cost of equipment and facilities to establish meal preparation sites on a systemwide basis would be approximately $13 million and that an additional $1.3 million and 24 staff positions would be required to administer the program. The ODS Logistics Division estimates the FY 1982 cost of equipment and facilities at $22.4 million.

Organization and Management

The headquarters of DoDDS is organized into the Office of the Director and five functional divisions which include the following: (1) Personnel, (2) Logistics, (3) Fiscal, (4) Education, and (5) Executive Services. The Personnel Division develops and implements policies, programs, and procedures with respect to the DoDDS personnel management system. The Logistics Division establishes and implements policies and procedures to provide effective supply support such as procurement of textbooks, equipment, supplies, transportation, and repair and maintenance of buildings and equipment. The Fiscal Division develops fiscal and budgeting guidance for the effective and efficient use of resources. The Education Division provides overall leadership for establishing a quality education program. It develops, implements, and evaluates the DoDDS educational programs. The Division develops policies and procedures related to curriculum and instruction, inservice training of educators, student services, evaluation, and accreditation. The Executive Services Division manages the automatic data processing (ADP) function within DoDDS headquarters and the regions, operates a public/community relations program, manages student records, and provides all other required administrative support to the headquarters.

The structure of the regional offices organizationally is identical to that of the headquarters, with an Office of the Director and five functional divisions.

In general, (1) the degree of implementation of the Five-Year Curriculum Development Plan varies greatly among the regions and schools; (2) the planning and monitoring systems are not sufficient to deal with the complexities of an organization as large as DoDDS; (3) the organizational structure and staffing differ among regions; (4) there is no systemmatic approach to prepare school principals for their increased responsibilities and support and accountability is weak at the school principal level in the DoDDS system; (5) many of the ADP systems are no longer effectively maintained; (6) the Quarterly Management Report, the only systemwide management mechanism in DoDDS does not focus on management plans or objectives and does not provide systemmatic feedback from headquarters to the regions on the report data.

Additionally, the following organizational and management problems exist in DoDDS:

1. There is confusion over the roles and authorities of the various levels in the current system;
2. There is no strong program planning function consistent with a unified system;
3. There is no systemmatic evaluation of the broad aspects of the DoDDS program;
4. There is no current mechanism to establish management plans, goals, and objectives, or to track their implementation and assess their impact;
5. There is no effective communication system; and
6. There is no comprehensive data system (most functions are not carried out with manual procedures and systems).

The Panama Canal College

Section 302(d) of Public Law 96-88 states that the Secretary of Education is not authorized to operate overseas institutions of higher education.

Summary of Recommendations in Transfer Plan

The concluding section of this analysis is a summary of additional recommendations included in the Transfer Plan.

1. School Community Participation

The Transfer Plan recommends that the Advisory Council on Dependents Education should be assigned primary responsibility for submitting a report to the Secretary of Education, the Secretary of Defense, and the Congress on recommended ways of increasing school community participation in the administration and operation of the overseas dependents school system by May 1983.

Also, the Transfer Plan recommends a systemmatic process for further developing and testing alternatives with full participation by those affected. In this regard, the Transfer Plan includes a recommendation to modify sections 1410 and 1411 of P.L. 95-561 to permit testing of recommendations of the Advisory Council on Dependents Education for increasing school community participation in the overseas dependents school system. Section 1410 provides for the establishment of an advisory committee for each school in the defense dependents' education system. Section 1411 provides for the establishment of the Advisory Council on Dependents' Education.

Additionally, it should be noted that the Transfer Plan recommends the inclusion of "a representative of each unified military command in which defense dependents schools are located" on the Advisory Council on Dependents' Education through an amendment to Section 1411 (a) of P.L. 95-561. Section 1411 (a) provides for the composition of the Advisory Council on Dependents' Education.

II. Education Programs and Services

1. Routine collection and utilization of data on teachers, students, characteristics of schools, and other important factors;
2. Formulation and implementation of policies that require specific local school participation in the curriculum review steps of the Five-Year Curriculum Development Plan;
3. Development of a system for setting priorities for education programs and examination of the goals of the various education programs in order to organize human and dollar resources more efficiently around shared program goals;
4. Direct feeding of the planning and review process into the budgetary process;
5. Adoption of program-based budget practices which are similar to those of most stateside public schools, in which funds for each education program are individually budgeted, expended, and tracked;
6. Adoption of a comprehensive inservice education program, with supporting policies, procedures, and funds;

7. Development of mechanisms that provide opportunities for sharing educational ideas, resources, and approaches among schools and regions of the overseas schools and organizations with a direct interest in and commitment to improving educational research and practice;

8. Adoption of logistical mechanisms that provide realistic support to education programs and services;

9. Funding and conducting a comprehensive program of evaluation to determine, on a continuing basis, the effectiveness of individual education programs and services and of the overall instructional program;

10. Development of a standard report form that will reduce problems of articulation between education programs as students rotate between stateside and overseas public schools;

11. Amendment of P.L. 95-561 to mandate a one-year development preshcool education program for four-year olds and permit programs for adult (K-12).

    Section 1402 (b)(3) of P.L. 95-561 requires the Secretary of Defense to provide a developmental preschool program for overseas dependents who are of preschool age "if a preschool program is not otherwise available for such individuals and if funds for such a program are available."

    Presently, an adult education program is not offered in DoDDS. However, courses for adults were provided during the 1971-76 period as part of P.L. 91-219 /Predischarge Education Program (PREP), enacted by Congress in March 1970/. Subsequently, PREP programs were sponsored by numerous school districts in the United States as well as by DoDDS;

12. Congressional funding of a single appropriation each year to cover all education programs and services for overseas dependents and remove the overschools system from those eligible for appropriations authorized under P.L. 95-561.

III. Personnel Management

1. Development of a comprehensive work force planning system for implementation during the 1982-83 school year;

2. Establishment of a mandatory rotation policy for U.S. professional personnel based on a maximum tour of five years in the same school complex/installation; (Note: The mandatory aspect of the plan should be its development by DoDDS. Teacher participation should be on a voluntary basis).

3. Creation of additional opportunities for exchange teaching and administrative staff between the overseas dependents schools and U.S. school districts;

4. Improvement of the teacher recruitment program by placing more emphasis on accurate recruitment projections, timeliness of hiring commitments, and better targeted recruitment efforts in the United States.

IV. Financial Management

1. Development of a program-based budget and accounting system by FY 1984. Specific education program and staffing cost factors should be clearly identified;

2. Determination of the total costs of operating the school system by identifying and reporting all costs;

3. Establishment of a tuition-collection unit in the DoDDS central office to develop cash management policies and procedures in order to effectively monitor the tuition-collection program;

4. Development and implementation of a financial management training program for school principals.

V. Logistical Support Services

1. Completion of the comparative cost analysis of in-house and commercial contract school busing services and adoption of the most efficient and cost-effective means of transporting dependent students;

2. Military Department's funding of the costs of routine maintenance and cyclical repair performed by facilities used by DoDDS but to which the military departments hold title;

3. Development and maintenance of a complete inventory of current dependents school interservice support agreements by the Department of Education;

4. Consultation with local school and installation advisory committees regarding implementation of school lunch programs;

5. Intensification of the efforts of the Defense Logistics Agency (DLA) and the Defense General Supply Center (DGSC) to link DoDDS procurement procedures with the Standard Automatic Material Management System (SAMMS);

6. Amendment of Public Law 95-561, Title XIV, Section 1407 (b) and 37 U.S.C. 429 to expressly authorize dependent students attending non-DoDDS boarding facilities to receive the same transportation allowances provided to dependent students attending DoDDS dormitory schools.

VI. Organization and Management

1. Redefinition of the roles and responsibilities of the headquarters, regional offices, and subordinate administrative levels. Under this redefinition, the role of the headquarters office should be mainly policy and general management direction. The role and authority of regional officers should be strengthened as the operational units in control of day-to-day activities in the regions;

2. Creation of a program planning and monitoring unit in headquarters;

3. Development of a management planning and reporting system to establish management goals and objectives, track their implementation at the regional and school levels, and assess the adequacy of achievement;

4. Development of an automated data processing system to meet basic management requirements;

5. Strengthening of the evaluation function to ensure a regular, systematic assessment of major educational programs and to compare the results of that assessment periodically against an appropriate reference group of excellent school systems in the United States;

6. Establishment of a more effective communications system which should include in addition to program and management planning and monitoring systems (recommendations 2 and 3), a newsletter on important issues;

7. Redesign of the headquarters office organization and holding of regular meetings which should include the Administrator, Deputy Administrator, Associate Administrators, and Regional Directors serving as a management group for planning, implementing, and evaluating the overall administration of the overseas school system.

VII. The Panama Canal College

Consistent with Section 302(d) of P.L. 96-88 which states that the Secretary of Education is not authorized to operate overseas institutions of higher education, the Transfer Plan recommends that the responsibility for the Panama Canal College remain with the Department of Defense.

Conclusion

Based upon the above summary and analysis of the findings and recommendations of the Transfer Plan of the Overseas Schools for Military Dependents (DoDDS) to the Department of Education (ED) from the Department of Defense (DOD), there are many problems which adversely affect the achievement of quality of education for children and the protection of rights of teachers and other educational personnel. The problems identified in the Transfer Plan have not been addressed by DOD.

These problems can be solved through the resources available in ED.

Therefore, consistent with the mandates of Public Law 96-88 and Public Law 95-561, we conclude and recommend that the DoDDS transfer to the Department of Education be completed.